

**FLORENCE COPPER INC.**

1575 W. Hunt Highway, Florence, Arizona 85132 USA

florencecopper.com

October 28, 2020

U.S. Environmental Protection Agency, Region 9
Drinking Water Protection Section (WTR 4-2)
75 Hawthorne Street
San Francisco, California 94105

Attention: David Albright, Manager, Ground Water Office

Subject: Third Quarter 2020 Monitoring Report
Underground Injection Control (UIC) Permit No. R9UIC-AZ3-FY11-1

Dear Mr. Albright:

Florence Copper Inc. (Florence Copper) is regulated under UIC Permit No. R9UIC-AZ3-FY11-1, issued December 20, 2016, for a Production Test Facility (PTF). The facility began active operations on December 15, 2018. The rinsing demonstration for the PTF began on June 26, 2020. This report outlines the reporting requirements in accordance with Part II.G.2 of that Permit.

Background Information

The Florence Copper Project is an in-situ copper extraction facility subject to three related permits issued by the U.S. Environmental Protection Agency (USEPA) and the Arizona Department of Environmental Quality (ADEQ).

Aquifer Protection Permit (APP) Covering the 1997-98 BHP Pilot Facilities and Future Operations (Sitewide APP):

- ADEQ APP No. P-101704 (LTF 65804) dated October 13, 2017.

A test wellfield, a small leachate processing facility, and a double-lined evaporation pond were constructed as authorized by APP No. P-101704 in 1997. The Pilot Test Facility operated from October 31, 1997 to February 9, 1998. The test wellfield was rinsed until September 1, 2004. Cessation of hydraulic control for testing was approved by both agencies and the wellfield has since remained inactive. Subsequently, no Sitewide permit-related activities have taken place. The authorized facilities and monitoring wells are identified on Figure 1.

Permits Covering the Current Production Test Facility:

- ADEQ Temporary APP No. P-106360 (LTF 80030) dated February 13, 2020; and
- USEPA UIC Permit No. R9UIC-AZ3-FY11-1 dated December 20, 2016.

These permits authorize operation of the PTF and set forth separate monitoring requirements to be applied at the PTF, which lies within the area covered by the Sitewide APP. The Temporary APP and UIC facilities and monitoring wells are identified on Figure 1. The configuration of the PTF wellfield is shown on Figure 2. The

facility received authorization to proceed with pre-operational activities on July 13, 2017, and the PTF wellfield was completed and began operations on December 15, 2018. The rinsing demonstration for the PTF began on June 26, 2020. During third quarter (Q3) 2020, process solutions continued to be processed through the Solvent Extraction/Electrowinning (SX/EW) plant to produce copper.

This report documents monitoring activities required by the UIC permit during Q3 2020. Reporting for the Sitewide and Temporary APP is performed separately; however, some information pertains to multiple permits and is reported accordingly.

PTF Operations Quarterly Reporting

- **Part II.G.2.a – Map of Operational Status and Groundwater Contours**

The monthly groundwater contour maps are included as Attachment 1. The operational status of the PTF facility was ACTIVE during Q3 2020.

- **Part II.G.2.b – Table and Graphs of Injected and Recovered Volumes**

The daily cumulative injection and recovery volumes, and the daily percent recovery to injection volume values, are provided in tabular and graphical format in Attachment 2. Throughout Q3 2020, the extracted volume has consistently exceeded the injected volume by 10 percent or more and the monthly average injection rate remained below the 240 gallons per minute limit.

- **Part II.G.2.c – Table and Graphs of the Well Head Measurements in the PTF**

The daily average head measurement values for the observation wells and recovery wells are provided in tabular and graphical format in Attachment 3. The hydraulic gradient has been maintained with a greater than 1-foot differential as a daily average for all paired wells throughout Q3 2020.

- **Part II.G.2.d – Table and Graphs of Fluid Electrical Conductivity Measurements**

Fluid electrical conductivity (EC) values are provided in tabular and graphical format in Attachment 4. There were no days where observation well measurements were greater than injection well measurements during Q3 2020. As expected, fluid EC in the injection wells continued to decrease in Q3 2020 as the rinsing demonstration progressed.

- **Part II.G.2.e – Table and Graphs of Bulk Electrical Conductivity Measurements**

Bulk EC values are provided in tabular and graphical format in Attachment 5. No bulk EC alert level (AL) exceedances occurred during Q3 2020.

- **Part II.G.2.f – Table and Graphs of Monitor Well Water Levels and Analytical Results**

The Q3 2020 Compliance Monitoring Report is provided in Attachment 6 and presents the tabular results of groundwater elevations, analytical results, field parameters, and ALs and Aquifer Quality Limits for wells regulated under the UIC permit and Temporary APP. The Compliance Monitoring Report also provides a narrative summary of the Q3 2020 monitoring activities, a discussion of exceedances, and graphical presentation of monitoring results for a select set of parameters since the inception of monitoring.

- **Part II.G.2.g – Results of Monthly Lixiviant Organic Analysis**

The analytical results for monthly lixiviant organic analysis are provided in tabular format in Attachment 7. The monthly organic concentrations were below the AL throughout Q3 2020.

- **Part II.G.2.h – Results of Monitoring Required if Injection Fluid is Modified**

During Q3 2020 the rinsing demonstration continued and the acid concentration of the raffinate decreased over time. Process solution continued to flow through the SX/EW plant, reducing both the free acid and sulfate load in the formation while facilitating the continued removal of dissolved constituents. Routine monthly analysis of the raffinate was completed during Q3 2020 and will continue during the rinsing demonstration.

- **Part II.G.2.i – Results of Mechanical Integrity Testing**

Temperature logging of multi-level sampling wells WB-01, WB02, WB-03, and WB-04 was conducted during Q3 2020 to demonstrate mechanical integrity. A summary of results is provided in Attachment 8. Temperature logs in each of the four wells showed no anomalies that would indicate there is flow behind the well casings. A report discussing the temperature logging of the wells has been provided to the USEPA under separate cover.

- **Part II.G.2.j – Results of Annular Conductivity Device (ACD) Monitoring**

The results of the Q3 2020 well bore annular EC monitoring are provided in Attachment 9. Annular EC readings have remained approximately constant or increased slightly in 8 of the 11 wells since monitoring began in Q3 2018. Annular EC has decreased in wells O-04, O-06, and WB-01 during that same time. The results of the monitoring indicate the absence of injected fluid at the ACD locations.

- **Part II.G.2.k – Summary of Plugging and Abandonment Activity**

No plugging or abandonment activity was performed during Q3 2020.

- **Part II.G.2.l – Summary of Closure Operations**

No closure operations were conducted during Q3 2020.

- **Part II.G.2.m – Table of Monthly Casing Annulus and Injection Pressures**

Monthly maximum, minimum, and average injection pressures are provided in Attachment 10. There were no exceedances of the injection pressure limit during Q3 2020.

- **Appendix H – Migratory Bird Landings and Mortality**

Daily inspection of the Process Solution Impoundment was conducted to record any migratory bird landings and/or identify any migratory bird mortality. As summarized in Attachment 11, one landing event occurred during Q3 2020. No bird mortalities were observed during Q3 2020.

Please contact me at (520) 316-3710 with any questions regarding the content of this document.

Sincerely,
Florence Copper Inc.



Brent Berg
General Manager

Enclosures:

Figure 1 – Groundwater Monitoring Area

Figure 2 – PTF Wellfield

Attachment 1 – Map of Operational Status and Groundwater Contours

Attachment 2 – Table and Graphs of Injected and Recovered Volumes

Attachment 3 – Table and Graphs of the Well Head Measurements in the Production Test Facility

Attachment 4 – Table and Graphs of Fluid Electrical Conductivity Measurements

Attachment 5 – Table and Graphs of Bulk Electrical Conductivity Measurements

Attachment 6 – Table and Graphs of Monitor Well Water Levels and Analytical Results

Attachment 7 – Results of Monthly Lixiviant Organic Analysis

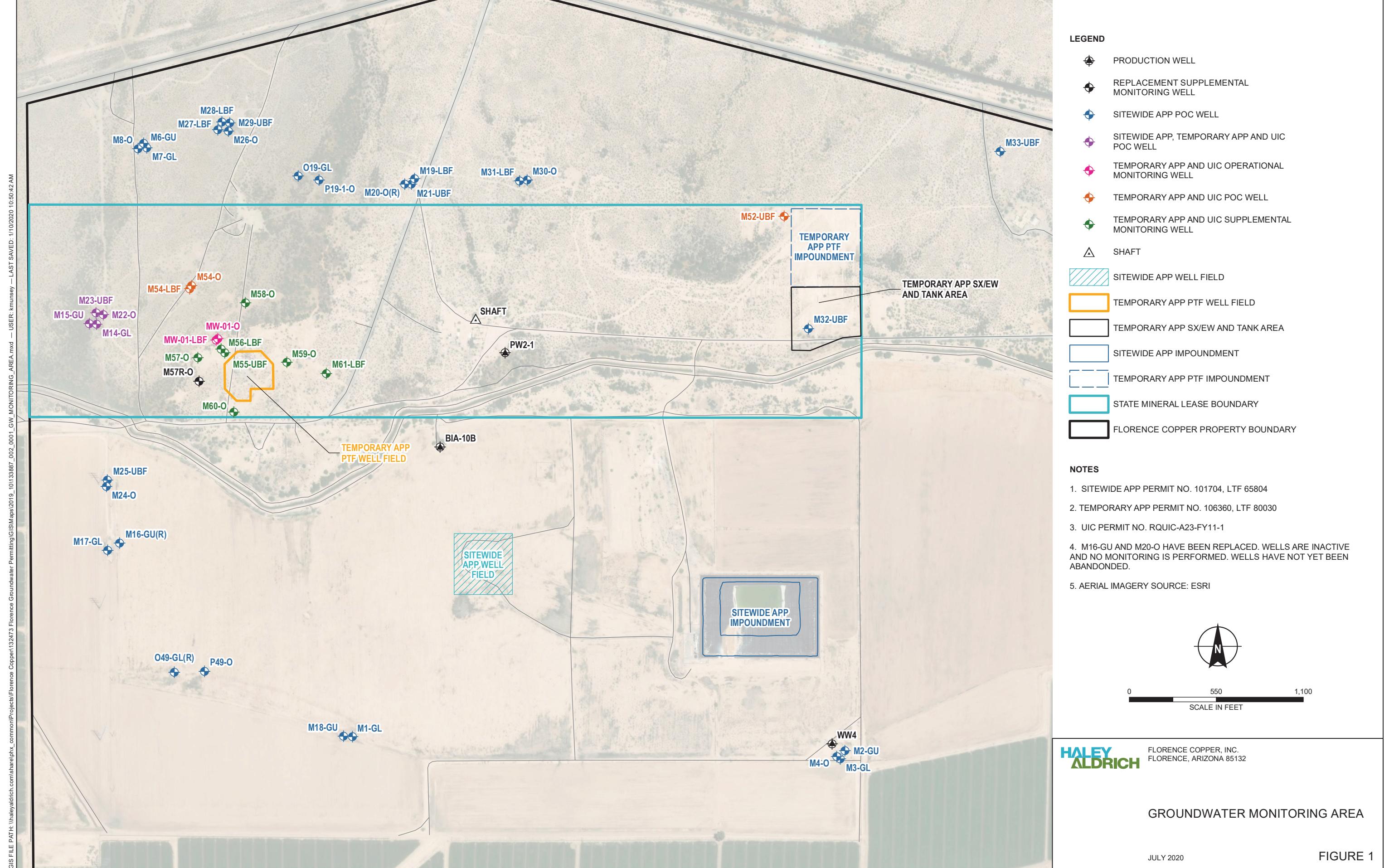
Attachment 8 – Results of Mechanical Integrity Testing

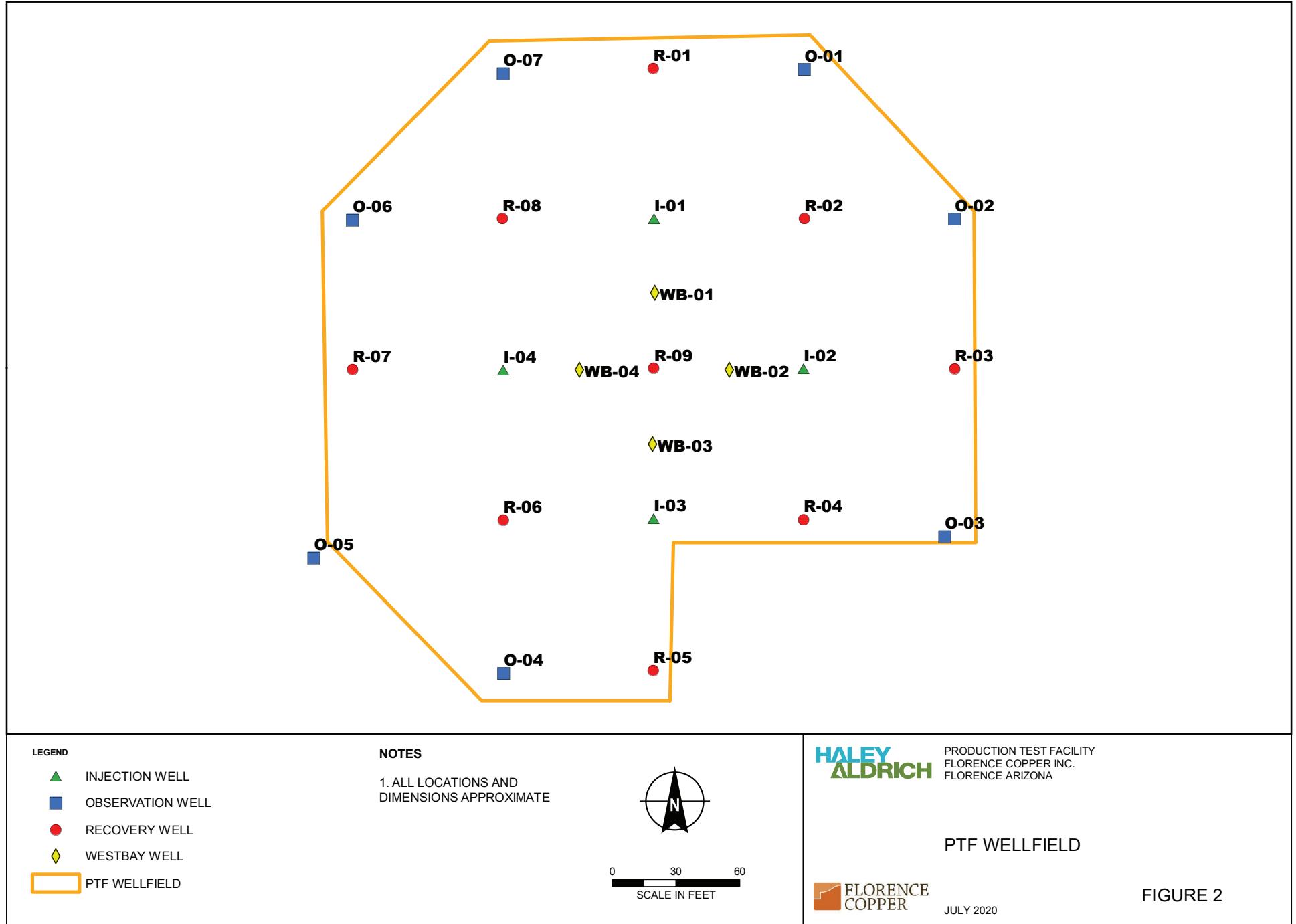
Attachment 9 – Results of Annular Conductivity Device Monitoring

Attachment 10 – Table of Monthly Casing Annulus and Injection Pressures

Attachment 11 – Migratory Bird Landings

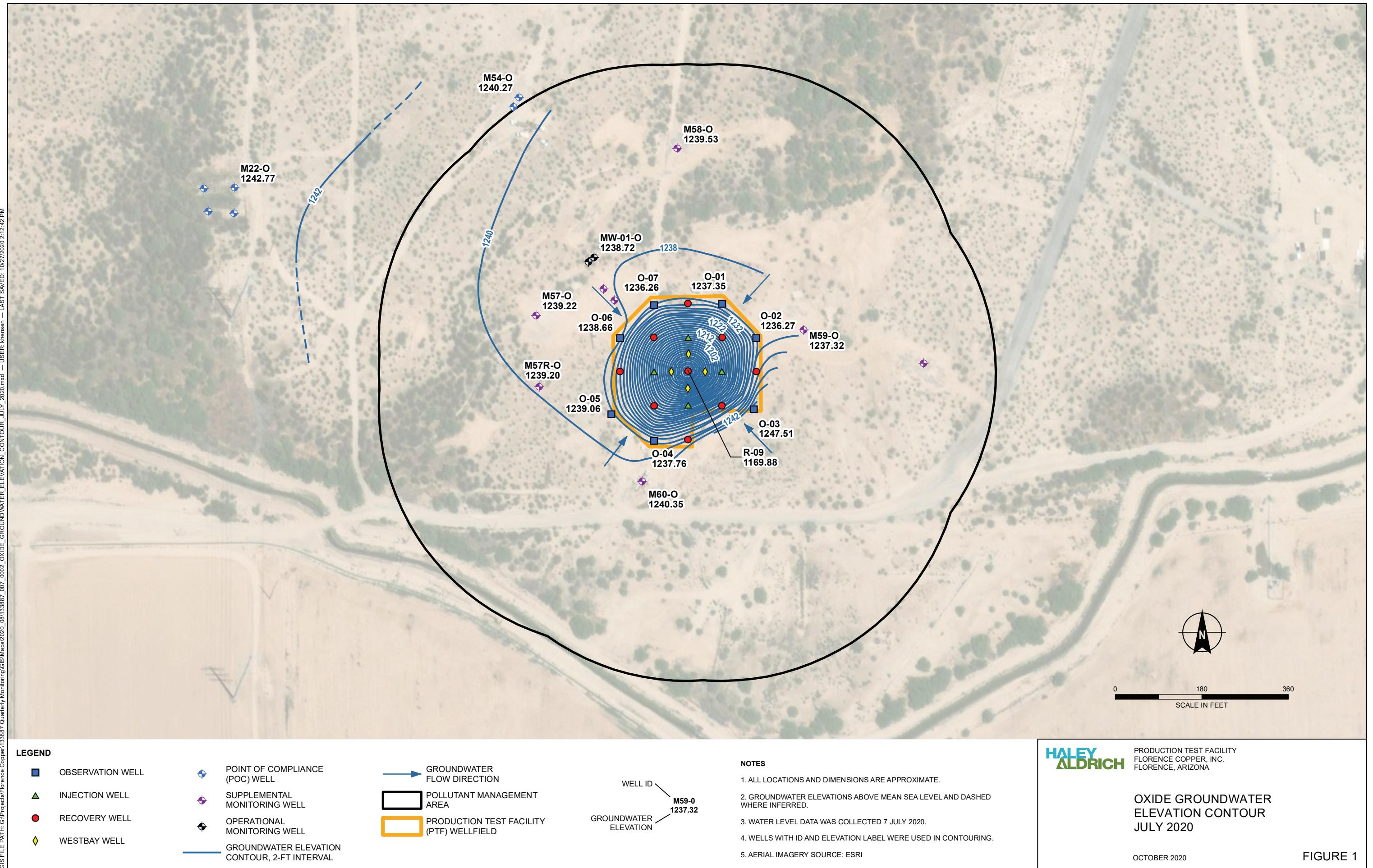
FIGURES

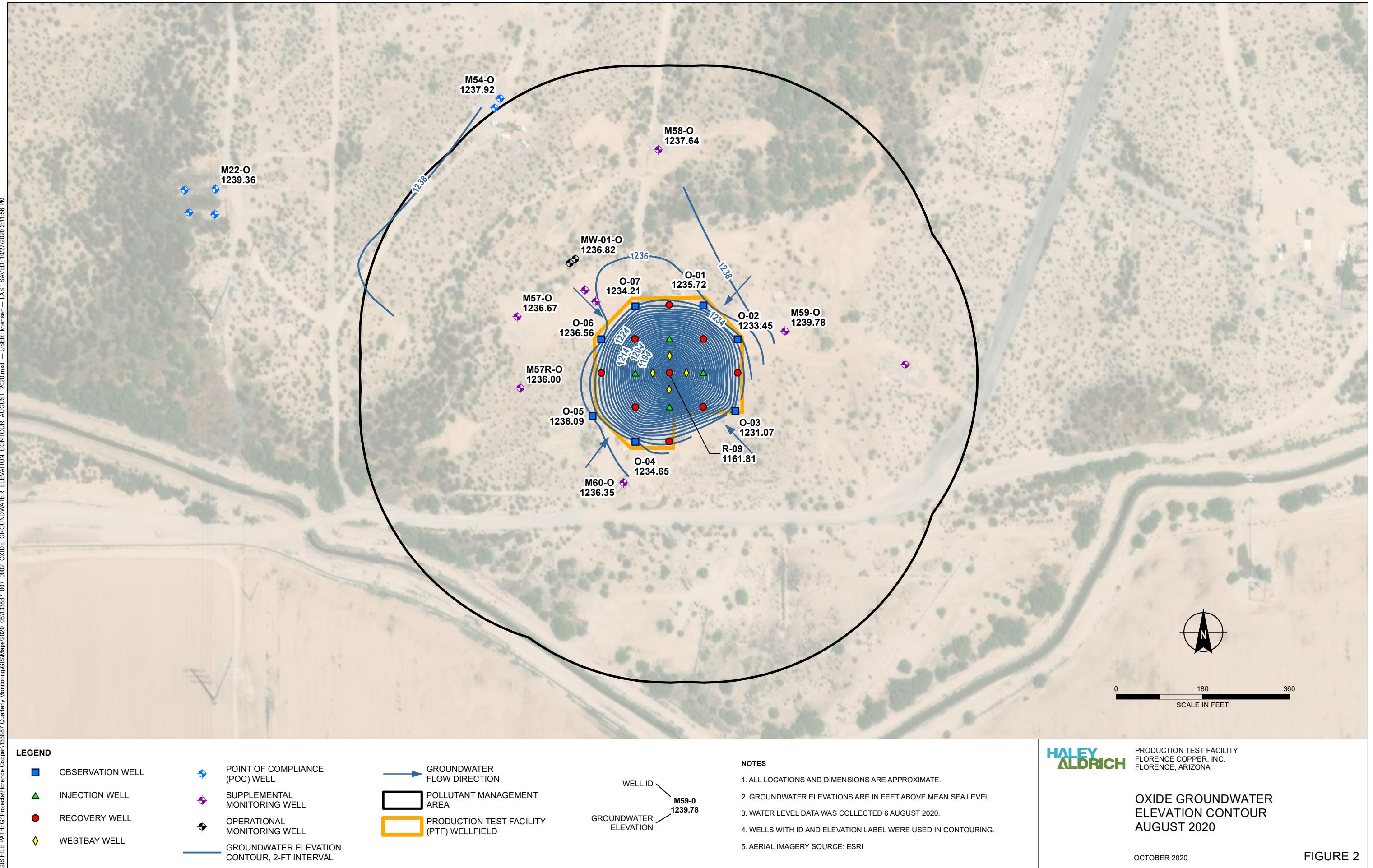


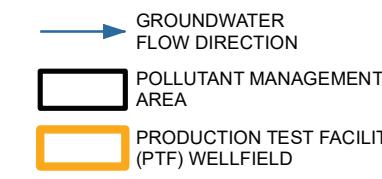
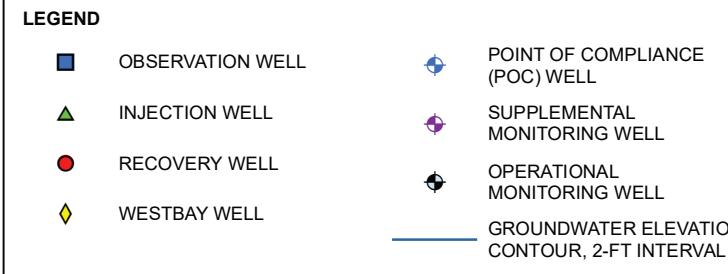
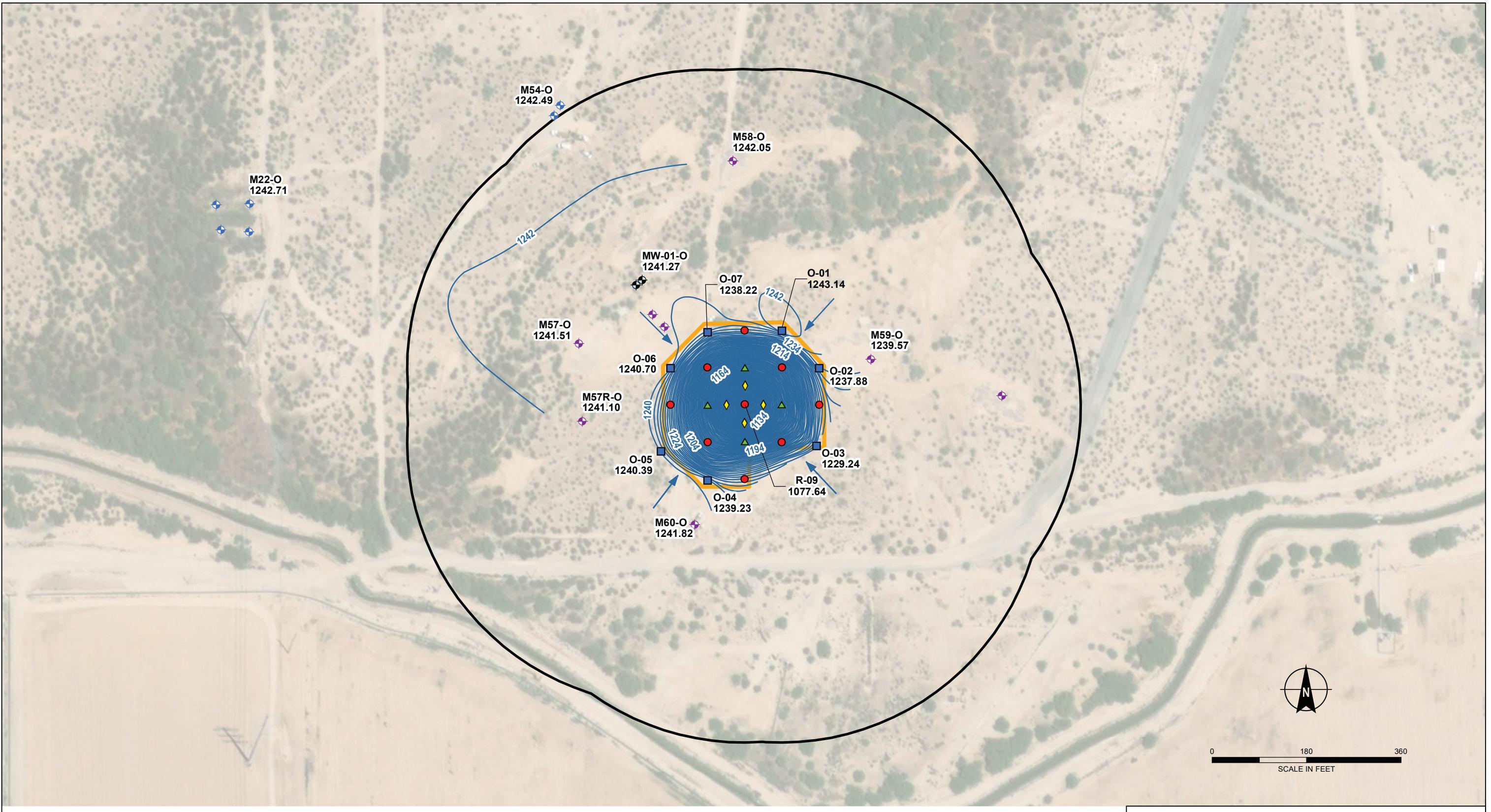


ATTACHMENT 1

Map of Operational Status and Groundwater Contours







WELL ID
M59-O
1239.57

GROUNDWATER ELEVATION

NOTES

- ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
- GROUNDWATER ELEVATIONS ARE IN FEET ABOVE MEAN SEA LEVEL.
- WATER LEVEL DATA WAS COLLECTED 10 SEPTEMBER 2020.
- WELLS WITH ID AND ELEVATION LABEL WERE USED IN CONTOURING.
- AERIAL IMAGERY SOURCE: ESRI

HALEY ALDRICH

PRODUCTION TEST FACILITY
FLORENCE COPPER, INC.
FLORENCE, ARIZONA

OXIDE GROUNDWATER
ELEVATION CONTOURS
SEPTEMBER 2020

OCTOBER 2020

FIGURE 3

ATTACHMENT 2

Table and Graphs of Injected and Recovered Volumes

Q3 2020 DAILY INJECTION AND RECOVERY

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VOLUMES WITH PERCENT RECOVERY

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 1. July 2020 Daily Injection and Recovery Volumes

Date	Daily Injection Volume (gallons)	Daily Recovery Volume (gallons)	Ratio PLS/Raff	% Recovery
7/1/2020	351,800	388,800	1.11	111
7/2/2020	353,300	391,200	1.11	111
7/3/2020	353,300	391,200	1.11	111
7/4/2020	352,900	389,900	1.10	110
7/5/2020	351,900	389,000	1.11	111
7/6/2020	351,700	389,600	1.11	111
7/7/2020	351,600	389,200	1.11	111
7/8/2020	351,800	387,800	1.10	110
7/9/2020	351,700	390,300	1.11	111
7/10/2020	351,900	390,600	1.11	111
7/11/2020	351,700	391,100	1.11	111
7/12/2020	351,700	393,500	1.12	112
7/13/2020	351,800	393,700	1.12	112
7/14/2020	351,700	393,500	1.12	112
7/15/2020	351,700	393,700	1.12	112
7/16/2020	351,700	393,700	1.12	112
7/17/2020	351,700	393,500	1.12	112
7/18/2020	351,800	392,500	1.12	112
7/19/2020	351,600	393,700	1.12	112
7/20/2020	351,900	393,600	1.12	112
7/21/2020	351,700	393,000	1.12	112
7/22/2020	351,800	393,600	1.12	112
7/23/2020	314,300	359,400	1.14	114
7/24/2020	295,500	341,500	1.16	116
7/25/2020	295,800	342,100	1.16	116
7/26/2020	295,500	341,500	1.16	116
7/27/2020	295,600	341,900	1.16	116
7/28/2020	295,400	343,800	1.16	116
7/29/2020	295,600	341,600	1.16	116
7/30/2020	295,500	346,700	1.17	117
7/31/2020	294,400	350,400	1.19	119
JUL Averages	336,139	378,245	1.13	113

JUL Averages	Monthly Average Injection Volume (GPM)	Monthly Average Recovery Volume (GPM)
	233	263

Notes:

% = percent

GPM = gallons per minute

PLS = pregnant leach solution

Raff = raffinate

Q3 2020 DAILY INJECTION AND RECOVERY

Page 2 of 3

VOLUMES WITH PERCENT RECOVERY

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 2. August 2020 Daily Injection and Recovery Volumes

Date	Daily Injection Volume (gallons)	Daily Recovery Volume (gallons)	Ratio PLS/Raff	% Recovery
8/1/2020	295,200	350,400	1.19	119
8/2/2020	295,500	351,900	1.19	119
8/3/2020	295,400	342,800	1.16	116
8/4/2020	295,600	345,900	1.17	117
8/5/2020	295,500	346,900	1.17	117
8/6/2020	295,500	348,300	1.18	118
8/7/2020	295,500	348,700	1.18	118
8/8/2020	295,800	349,600	1.18	118
8/9/2020	295,500	348,000	1.18	118
8/10/2020	295,500	341,500	1.16	116
8/11/2020	295,500	342,200	1.16	116
8/12/2020	295,600	341,800	1.16	116
8/13/2020	295,500	335,000	1.13	113
8/14/2020	295,500	334,400	1.13	113
8/15/2020	295,600	334,600	1.13	113
8/16/2020	295,600	334,600	1.13	113
8/17/2020	295,500	334,500	1.13	113
8/18/2020	295,500	334,500	1.13	113
8/19/2020	295,500	333,900	1.13	113
8/20/2020	295,600	335,100	1.13	113
8/21/2020	295,600	335,400	1.13	113
8/22/2020	295,500	334,600	1.13	113
8/23/2020	295,500	334,300	1.13	113
8/24/2020	295,600	334,500	1.13	113
8/25/2020	295,500	334,900	1.13	113
8/26/2020	295,500	334,700	1.13	113
8/27/2020	295,600	334,400	1.13	113
8/28/2020	295,600	334,500	1.13	113
8/29/2020	295,600	334,700	1.13	113
8/30/2020	295,500	334,500	1.13	113
8/31/2020	295,600	334,500	1.13	113
AUG Averages	295,532	339,213	1.15	115

AUG Averages	Monthly Average Injection Volume (GPM)	Monthly Average Recovery Volume (GPM)
	205	236

Notes:

% = percent

GPM = gallons per minute

PLS = pregnant leach solution

Raff = raffinate

Q3 2020 DAILY INJECTION AND RECOVERY

Page 3 of 3

VOLUMES WITH PERCENT RECOVERY

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 3. September 2020 Daily Injection and Recovery Volumes

Date	Daily Injection Volume (gallons)	Daily Recovery Volume (gallons)	Ratio PLS/Raff	% Recovery
9/1/2020	295,400	334,600	1.13	113
9/2/2020	295,600	334,400	1.13	113
9/3/2020	295,500	334,400	1.13	113
9/4/2020	295,600	334,600	1.13	113
9/5/2020	295,500	334,600	1.13	113
9/6/2020	295,600	334,500	1.13	113
9/7/2020	295,400	334,300	1.13	113
9/8/2020	295,600	334,600	1.13	113
9/9/2020	295,500	334,400	1.13	113
9/10/2020	295,500	334,500	1.13	113
9/11/2020	295,500	334,500	1.13	113
9/12/2020	295,600	334,600	1.13	113
9/13/2020	295,500	334,400	1.13	113
9/14/2020	295,600	334,500	1.13	113
9/15/2020	295,700	334,600	1.13	113
9/16/2020	295,600	334,400	1.13	113
9/17/2020	295,500	334,600	1.13	113
9/18/2020	295,500	334,300	1.13	113
9/19/2020	295,600	334,600	1.13	113
9/20/2020	295,500	334,300	1.13	113
9/21/2020	295,500	334,400	1.13	113
9/22/2020	295,600	334,400	1.13	113
9/23/2020	295,500	334,300	1.13	113
9/24/2020	295,600	334,300	1.13	113
9/25/2020	295,500	334,900	1.13	113
9/26/2020	295,500	334,700	1.13	113
9/27/2020	295,500	334,500	1.13	113
9/28/2020	295,600	334,600	1.13	113
9/29/2020	295,400	334,700	1.13	113
9/30/2020	295,600	334,400	1.13	113
SEP Averages	295,537	334,497	1.13	113

SEP Averages	Monthly Average Injection Volume (GPM)	Monthly Average Recovery Volume (GPM)
	205	232

Notes:

% = percent

GPM = gallons per minute

PLS = pregnant leach solution

Raff = raffinate

Figure 1. Injection vs. Recovery Volumes - July

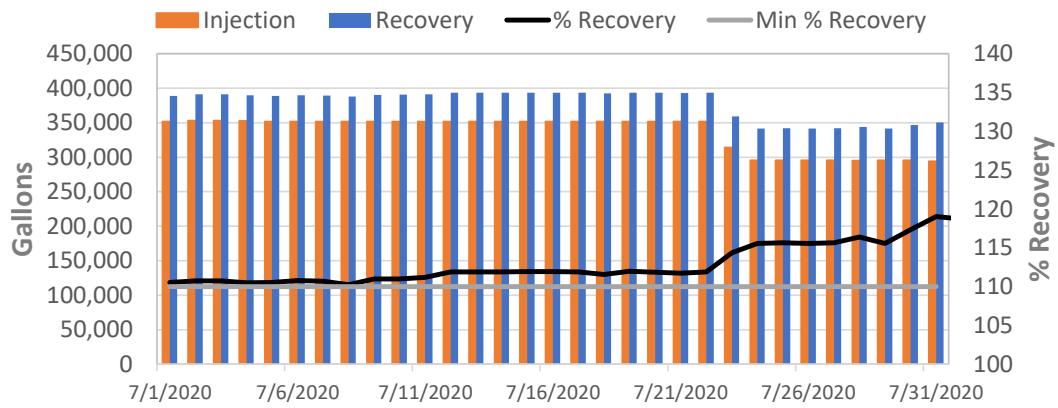


Figure 2. Injection vs. Recovery Volumes - August

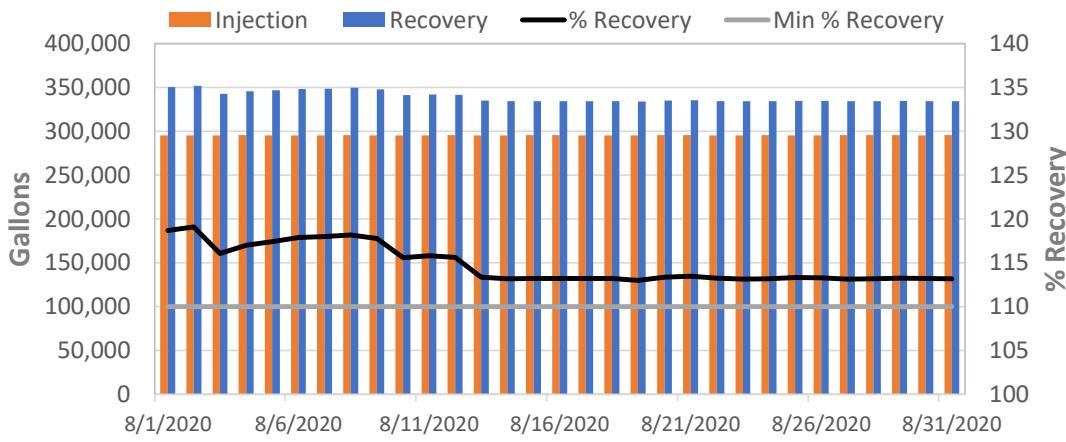
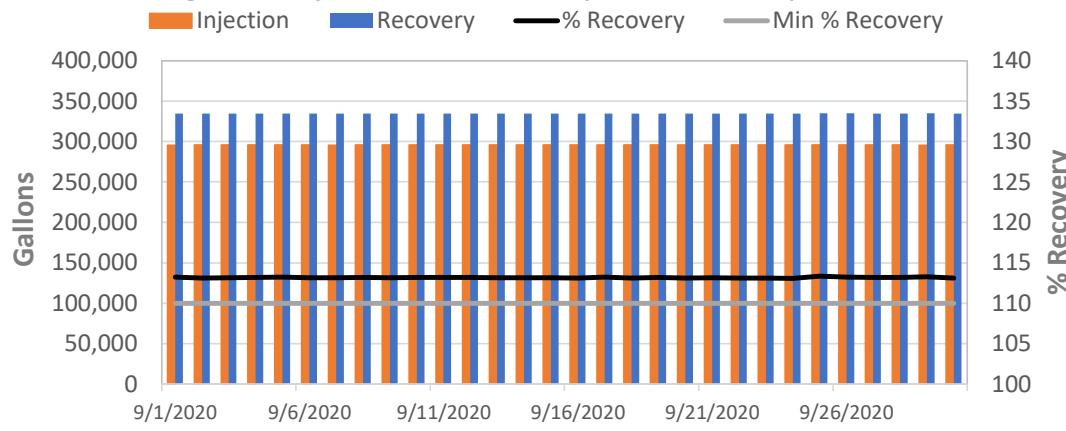


Figure 3. Injection vs. Recovery Volumes - September



ATTACHMENT 3

Table and Graphs of the Well Head Measurements in the Production Test Facility

Table 1. July 2020 Daily Average Water Level Elevations

Date	R-01	O-01	O-07	R-02	O-01	O-02	R-03	O-02	O-03	R-04	O-03	R-05	O-04	R-06	O-04	O-05	R-07	O-05	O-06	R-08	O-06	O-07	R-09
7/1/2020	1225.43	1243.12	1241.02	1207.93	1243.12	1241.16	1119.35	1241.16	NA	1068.38	NA	1199.46	1242.45	1210.22	1242.45	1243.42	1236.46	1243.42	1243.49	1219.92	1243.49	1241.02	1190.61
7/2/2020	1225.56	1243.57	1241.60	1207.69	1243.57	1241.53	1110.76	1241.53	1251.07	1054.99	1251.07	1192.37	1243.01	1206.37	1244.28	1238.47	1244.28	1244.22	1220.89	1244.22	1241.60	1192.45	
7/3/2020	1225.77	1243.59	1241.27	1210.18	1243.59	1241.57	1109.01	1241.57	1250.86	1050.26	1250.86	1189.36	1242.25	1204.77	1242.25	1243.56	1236.58	1243.56	1243.58	1219.80	1243.58	1241.27	1184.94
7/4/2020	1222.79	1241.29	1238.96	1210.33	1241.29	1239.42	1118.27	1239.42	1248.92	1056.30	1248.92	1185.90	1239.92	1205.25	1239.92	1241.29	1234.10	1241.29	1241.27	1217.82	1241.27	1238.96	1177.72
7/5/2020	1222.21	1240.22	1238.05	1205.59	1240.22	1238.18	1114.40	1238.18	1247.23	1042.38	1247.23	1186.12	1239.23	1209.98	1239.23	1240.67	1233.56	1240.67	1240.40	1215.17	1240.40	1238.05	1173.22
7/6/2020	1219.92	1235.78	1236.04	1198.91	1235.78	1235.95	1113.38	1235.95	1250.74	1043.60	1250.74	1191.12	1239.23	1183.17	1239.23	1240.29	1232.80	1240.29	1239.13	1214.17	1239.13	1236.04	1171.84
7/7/2020	1220.24	1237.35	1231.54	1197.48	1237.35	1236.27	1124.23	1236.27	1247.51	1067.94	1247.51	1196.68	1237.76	1167.15	1237.76	1239.06	1231.54	1239.06	1238.66	1215.27	1238.66	1231.54	1169.88
7/8/2020	1220.93	1238.86	1236.83	1203.41	1238.86	1237.05	1117.04	1237.05	1246.13	1064.33	1246.13	1195.52	1237.70	1163.46	1237.70	1239.03	1231.76	1239.03	1239.02	1216.08	1239.02	1236.83	1170.16
7/9/2020	1221.85	1239.62	1237.84	1201.83	1239.62	1237.70	1114.96	1237.70	1179.48	1058.08	1179.48	1195.87	1239.08	1162.46	1239.08	1240.27	1232.91	1240.27	1240.09	1217.69	1240.09	1237.84	1170.40
7/10/2020	1222.46	1240.24	1238.51	1199.88	1240.24	1238.15	1111.42	1238.15	1243.05	1033.96	1243.05	1189.26	1239.72	1176.02	1239.72	1241.00	1233.06	1241.00	1240.77	1217.95	1240.77	1238.51	1185.61
7/11/2020	1223.07	1240.89	1239.05	1196.53	1240.89	1238.93	1107.44	1238.93	1238.81	1036.90	1238.81	1195.07	1240.47	1179.31	1240.47	1241.58	1233.38	1241.58	1241.30	1217.60	1241.30	1239.05	1182.57
7/12/2020	1223.25	1241.42	1239.52	1197.41	1241.42	1239.47	1105.58	1239.47	1245.15	1036.22	1245.15	1193.79	1241.22	1179.37	1241.22	1242.29	1234.17	1242.29	1241.89	1218.95	1241.89	1239.52	1186.99
7/13/2020	1223.84	1241.63	1239.85	1196.01	1241.63	1239.67	1107.17	1239.67	1239.10	1030.34	1239.10	1190.96	1241.58	1177.54	1241.58	1242.71	1235.00	1242.71	1242.32	1218.79	1242.32	1239.85	1191.70
7/14/2020	1223.93	1241.63	1239.93	1197.38	1241.63	1239.66	1106.91	1239.66	1236.63	1033.71	1236.63	1191.45	1241.72	1175.96	1241.72	1242.73	1234.34	1242.73	1242.31	1220.40	1242.31	1239.93	1192.34
7/15/2020	1224.65	1242.62	1240.74	1198.93	1242.62	1240.79	1107.52	1240.79	1245.52	1033.64	1245.52	1191.42	1242.57	1175.59	1242.57	1243.56	1235.17	1243.56	1243.16	1222.25	1243.16	1240.74	1194.30
7/16/2020	1225.12	1243.01	1241.19	1199.78	1243.01	1241.14	1105.48	1241.14	1244.21	1032.39	1244.21	1191.16	1243.02	1175.47	1243.02	1244.03	1235.72	1244.03	1243.63	1222.72	1243.63	1241.19	1192.57
7/17/2020	1225.24	1243.46	1241.64	1187.51	1243.46	1241.50	1102.80	1241.50	1249.23	1029.21	1249.23	1191.31	1243.15	1155.66	1243.15	1244.20	1236.34	1244.20	1244.04	1225.10	1244.04	1241.64	1172.32
7/18/2020	1224.82	1243.96	1242.10	1182.68	1243.96	1241.95	1104.28	1241.95	1250.78	1029.02	1250.78	1190.79	1243.55	1149.85	1243.55	1244.75	1237.45	1244.75	1244.71	1227.59	1244.71	1242.10	1169.36
7/19/2020	1225.46	1244.11	1242.10	1183.38	1244.11	1242.13	1104.75	1242.13	1251.05	1030.02	1251.05	1191.24	1243.55	1148.52	1243.55	1244.66	1236.53	1244.66	1244.60	1227.21	1244.60	1242.10	1170.08
7/20/2020	1225.97	1244.17	1242.28	1183.72	1244.17	1242.23	1101.56	1242.23	1251.08	1028.46	1251.08	1192.12	1243.68	1147.53	1243.68	1244.77	1236.69	1244.77	1244.78	1229.75	1244.78	1242.28	1171.24
7/21/2020	1225.99	1244.38	1242.62	1183.67	1244.38	1242.26	1086.35	1242.26	1251.39	1024.36	1251.39	1190.96	1244.05	1147.31	1244.05	1245.31	1238.16	1245.31	1245.29	1227.91	1245.29	1242.62	1172.73
7/22/2020	1225.60	1244.31	1242.74	1183.12	1244.31	1242.05	1075.02	1242.05	1250.84	1020.37	1250.84	1190.41	1244.22	1146.94	1244.22	1245.51	1239.29	1245.51	1245.50	1229.78	1245.50	1242.74	1174.12
7/23/2020	1224.88	1243.71	1241.65	1191.69	1243.71	1241.36	1075.82	1241.36	1247.28	1018.55	1247.28	1188.46	1242.17	1143.61	1242.17	1243.68	1237.42	1243.68	1244.06	1230.70	1244.06	1241.65	1164.46
7/24/2020	1221.27	1240.32	1238.14	1193.07	1240.32	1237.90	1068.09	1237.90	1238.39	1018.11	1238.39	1182.93											

Table 2. August 2020 Daily Average Water Level Elevations

Date	R-01	O-01	O-07	R-02	O-01	O-02	R-03	O-02	O-03	R-04	O-03	R-05	O-04	R-06	O-04	O-05	R-07	O-05	O-06	R-08	O-06	O-07	R-09
8/1/2020	1222.39	1241.08	1239.80	1182.23	1241.08	1238.52	1059.80	1238.52	1240.91	1018.11	1240.91	1166.11	1239.57	1124.33	1239.57	1241.33	1235.15	1241.33	1242.32	1231.95	1242.32	1239.80	1165.39
8/2/2020	1223.03	1239.68	1238.69	1170.60	1239.68	1237.01	1056.03	1237.01	1236.18	1018.11	1236.18	1128.84	1237.38	1112.64	1237.38	1239.65	1233.89	1239.65	1241.07	NA	1241.07	1238.69	1164.41
8/3/2020	1221.29	1239.19	1237.37	1184.88	1239.19	1236.68	1056.77	1236.68	1236.03	1018.11	1236.03	1155.84	1236.56	1123.10	1236.56	1238.52	1232.75	1238.52	1239.66	1214.49	1239.66	1237.37	1162.97
8/4/2020	1217.89	1236.39	1230.22	1178.68	1236.39	1234.14	1059.99	1234.14	1232.22	1018.11	1232.22	1174.61	1234.51	1130.95	1234.51	1236.13	1230.22	1236.13	1236.80	1213.45	1236.80	1230.22	1161.25
8/5/2020	1217.22	1235.39	1233.65	1174.04	1235.39	1233.12	1055.10	1233.12	1229.90	1018.11	1229.90	1172.71	1233.90	1128.80	1233.90	1235.37	1229.42	1235.37	1235.98	1213.08	1235.98	1233.65	1161.54
8/6/2020	1217.54	1235.72	1234.21	1172.99	1235.72	1233.45	1052.07	1233.45	1231.07	1018.11	1231.07	1173.46	1234.65	1128.26	1234.65	1236.09	1230.05	1236.09	1236.56	1213.84	1236.56	1234.21	1161.81
8/7/2020	1217.62	1238.00	1236.04	1185.82	1238.00	1235.84	1055.40	1235.84	1235.92	1018.11	1235.92	1176.02	1236.73	1129.27	1236.73	1237.99	1231.17	1237.99	1238.42	1215.91	1238.42	1236.04	1162.72
8/8/2020	1217.72	1237.75	1235.77	1183.93	1237.75	1235.62	1055.33	1235.62	1235.48	1018.11	1235.48	1176.44	1236.34	1128.14	1236.34	1237.65	1230.80	1237.65	1238.14	1215.93	1238.14	1235.77	1162.69
8/9/2020	1218.05	1237.71	1235.72	1184.33	1237.71	1235.56	1054.45	1235.56	1234.90	1018.11	1234.90	1176.58	1236.10	1127.23	1236.10	1237.42	1230.81	1237.42	1238.04	1216.04	1238.04	1235.72	1162.49
8/10/2020	1219.75	1238.35	1236.34	1186.02	1238.35	1236.18	1054.57	1236.18	1235.87	1018.11	1235.87	1176.96	1236.54	1127.13	1236.54	1237.94	1232.06	1237.94	1238.62	1216.86	1238.62	1236.34	1163.38
8/11/2020	1220.07	1239.19	1237.16	1185.64	1239.19	1237.06	1060.71	1237.06	1238.00	1018.11	1238.00	1178.01	1237.63	1130.89	1237.63	1238.97	1232.95	1238.97	1239.51	1217.09	1239.51	1237.16	1163.71
8/12/2020	1221.22	1240.65	1238.57	1185.59	1240.65	1238.54	1065.96	1238.54	1240.99	1018.11	1240.99	1179.79	1239.25	1132.95	1239.25	1240.52	1234.41	1240.52	1240.95	1218.80	1240.95	1238.57	1164.65
8/13/2020	1222.70	1242.02	1240.06	1186.81	1242.02	1239.82	1063.69	1239.82	1242.91	1018.11	1242.91	1172.51	1240.77	1133.68	1240.77	1242.19	1237.59	1242.19	1242.61	1219.09	1242.61	1240.06	1166.10
8/14/2020	1222.91	1241.83	1239.93	1186.69	1241.83	1239.47	1062.30	1239.47	1244.33	1018.11	1244.33	1172.04	1240.39	1132.25	1240.39	1241.98	1237.48	1241.98	1242.42	1219.57	1242.42	1239.93	1165.89
8/15/2020	1221.14	1240.13	1238.09	1184.91	1240.13	1237.91	1059.76	1237.91	1238.46	1018.11	1238.46	1169.81	1238.20	1129.46	1238.20	1239.84	1235.47	1239.84	1240.44	1217.94	1240.44	1238.09	1164.43
8/16/2020	1219.75	1238.74	1236.64	1183.40	1238.74	1236.48	1057.45	1236.48	1235.48	1018.11	1235.48	1167.91	1236.54	1127.13	1236.54	1238.18	1233.93	1238.18	1238.92	1216.75	1238.92	1236.64	1163.35
8/17/2020	1220.60	1239.61	1237.60	1184.12	1239.61	1237.34	1057.09	1237.34	1237.59	1018.11	1237.59	1168.73	1237.86	1127.47	1237.86	1239.37	1234.96	1239.37	1239.91	1217.76	1239.91	1237.60	1164.25
8/18/2020	1223.19	1243.85	1240.04	1185.47	1243.85	1241.56	1060.16	1241.56	1243.15	1018.11	1243.15	1156.90	1239.39	1113.32	1239.39	1241.12	1236.73	1241.12	1241.97	1212.69	1241.97	1240.04	1165.50
8/19/2020	1221.88	1244.46	1240.83	NA	1244.46	1242.14	1061.44	1242.14	1244.91	1018.11	1244.91	1158.24	1240.42	1112.23	1240.42	1242.19	1237.45	1242.19	1242.99	1213.64	1242.99	1240.83	1166.02
8/20/2020	1219.69	1244.79	1241.11	NA	1244.79	1242.33	1065.22	1242.33	1245.56	1018.11	1245.56	1157.82	1240.90	1112.34	1240.90	1242.70	1238.02	1242.70	1243.36	1214.23	1243.36	1241.11	1166.21
8/21/2020	1222.88	1243.25	1240.55	1203.58	1243.25	1241.02	1066.18	1241.02	1245.19	1012.05	1245.19	1169.05	1240.83	1129.80	1240.83	1242.28	1237.69	1242.28	1242.87	1219.02	1242.87	1240.55	1165.86
8/22/2020	1222.98	1242.08	1240.04	1203.70	1242.08	1239.81	1060.72	1239.81	1242.62	1018.11	1242.62	1171.23	1240.65	1134.97	1240.65	1242.03	1237.53	1242.03	1242.47	1220.73	1242.47	1240.04	1166.02
8/23/2020	1223.56	1242.69	1240.59	1203.19	1242.69	1240.45	1060.56	1240.45	1244.38	1018.11	1244.38	1171.32	1241.37	1134.68	1241.37	1242.70	1238.20	1242.70	1243.07	1221.53	1243.07	1240.59	1166.64
8/24/2020	1212.62	1242.28	1239.19	1204.72	1242.28	1241.03	1060.41	1241.03	1248.78	1018.11	1248.78	1173.5											

OBSERVATIONS AND RECOVERY WELLS

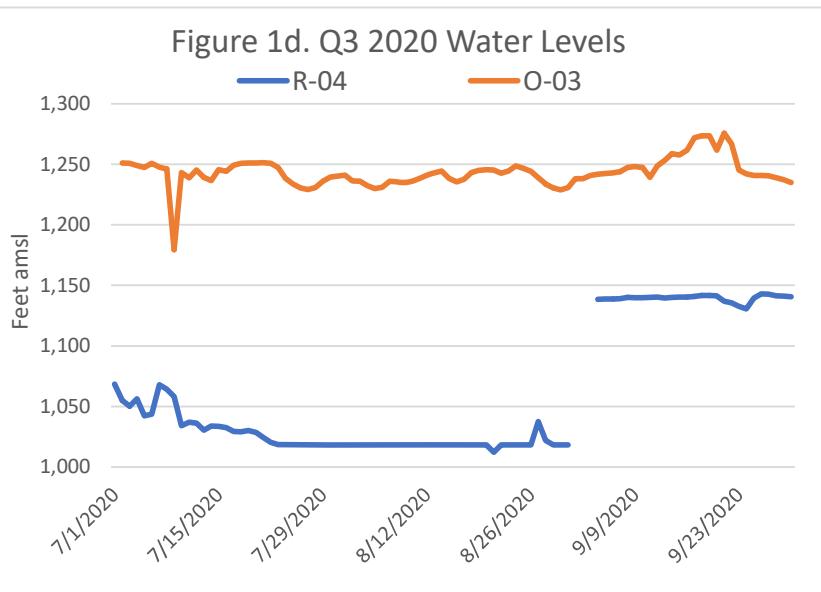
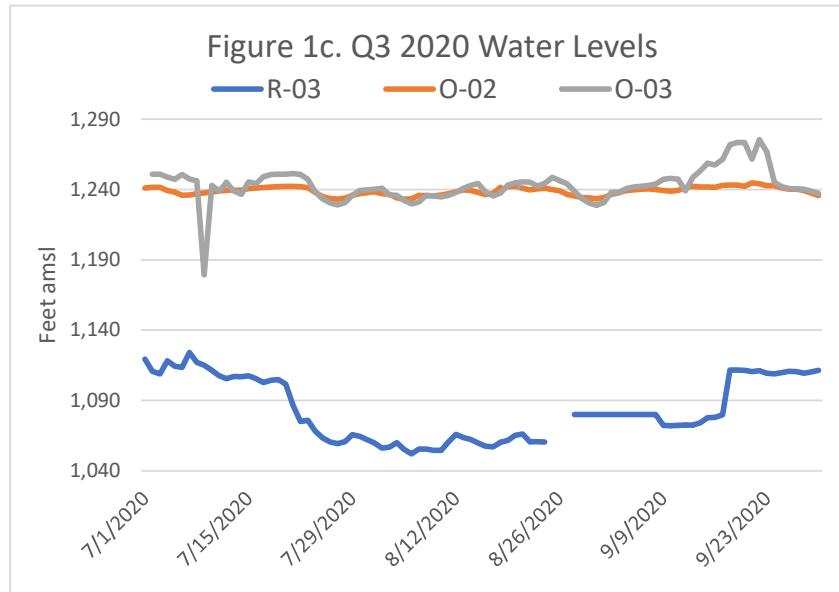
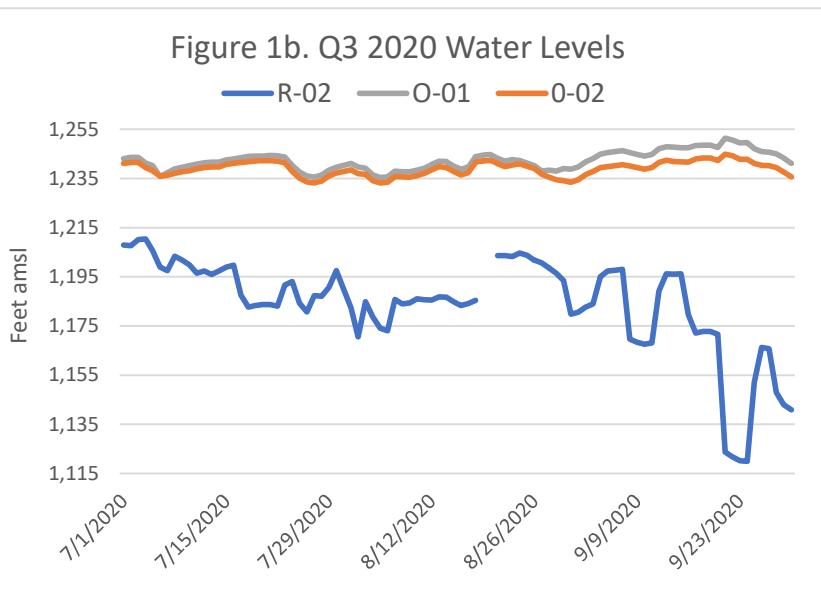
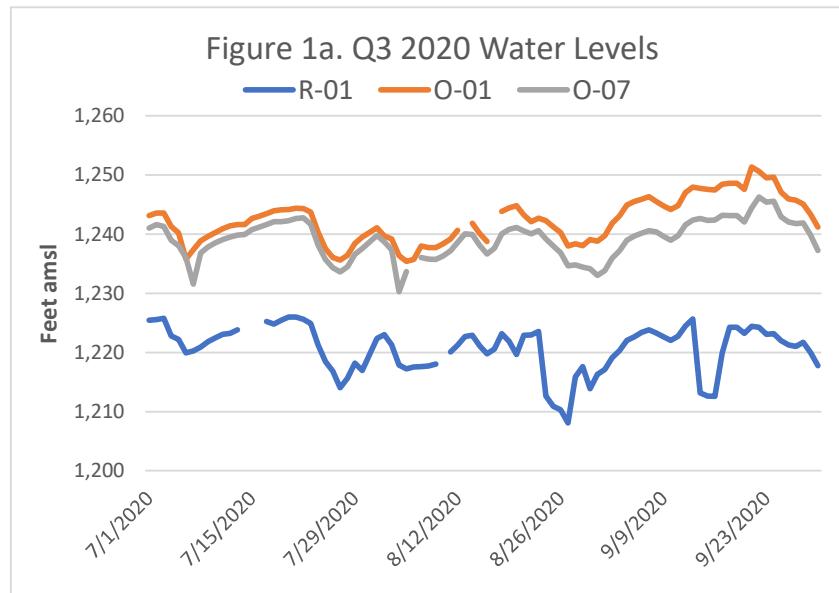
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FLORENCE, ARIZONA

Table 3. September 2020 Daily Average Water Level Elevations

Date	R-01	O-01	O-07	R-02	O-01	O-02	R-03	O-02	O-03	R-04	O-03	R-05	O-04	R-06	O-04	O-05	R-07	O-05	O-06	R-08	O-06	O-07	R-09
9/1/2020	1217.11	1239.72	1233.83	1180.55	1239.72	1234.43	1080.04	1234.43	1237.95	NA	1237.95	1129.87	1234.11	1112.50	1234.11	1235.39	1231.01	1235.39	1236.09	1208.53	1236.09	1233.83	1162.01
9/2/2020	1219.11	1241.84	1235.92	1182.66	1241.84	1236.58	1080.04	1236.58	1237.95	NA	1237.95	1132.69	1236.57	1112.50	1236.57	1237.65	1233.19	1237.65	1238.24	1211.03	1238.24	1235.92	1163.77
9/3/2020	1220.33	1243.10	1237.18	1183.98	1243.10	1237.87	1080.04	1237.87	1240.60	NA	1240.60	1133.18	1237.90	1112.63	1237.90	1238.98	1234.44	1238.98	1239.54	1212.61	1239.54	1237.18	1164.63
9/4/2020	1222.04	1244.92	1238.98	1195.09	1244.92	1239.37	1080.04	1239.37	1241.79	1138.53	1241.79	1151.66	1239.66	1128.03	1239.66	1240.76	1236.37	1240.76	1241.35	1218.84	1241.35	1238.98	1166.08
9/5/2020	1222.62	1245.50	1239.68	1197.40	1245.50	1239.78	1080.04	1239.78	1242.36	1138.66	1242.36	1154.50	1240.40	1131.82	1240.40	1241.57	1237.00	1241.57	1242.09	1221.28	1242.09	1239.68	1166.68
9/6/2020	1223.39	1245.91	1240.17	1197.60	1245.91	1240.19	1080.04	1240.19	1242.92	1138.78	1242.92	1155.02	1240.91	1131.74	1240.91	1242.11	1237.69	1242.11	1242.62	1222.16	1242.62	1240.17	1166.68
9/7/2020	1223.85	1246.33	1240.61	1198.02	1246.33	1240.61	1080.04	1240.61	1243.88	1138.91	1243.88	1157.39	1241.46	1131.79	1241.46	1242.65	1238.24	1242.65	1243.08	1222.89	1243.08	1240.61	1166.85
9/8/2020	1223.30	1245.51	1240.39	1169.68	1245.51	1240.15	1080.04	1240.15	1247.28	1140.09	1247.28	1157.73	1242.66	1112.84	1242.66	1243.01	1238.29	1243.01	1243.00	1216.66	1243.00	1240.39	1166.75
9/9/2020	1222.62	1244.78	1239.64	1168.41	1244.78	1239.40	1072.14	1239.40	1248.04	1139.90	1248.04	NA	1241.74	1112.57	1241.74	1242.21	1237.54	1242.21	1242.28	1216.19	1242.28	1239.64	1166.01
9/10/2020	1222.04	1244.16	1238.99	1167.61	1244.16	1238.81	1072.09	1238.81	1247.28	1139.86	1247.28	NA	1241.05	1112.93	1241.05	1241.53	1236.90	1241.53	1241.67	1215.86	1241.67	1238.99	1165.74
9/11/2020	1222.77	1244.79	1239.73	1168.09	1244.79	1239.45	1072.17	1239.45	1239.08	1140.15	1239.08	NA	1242.05	1112.75	1242.05	1242.45	1237.64	1242.45	1242.44	1216.73	1242.44	1239.73	1165.87
9/12/2020	1224.49	1247.05	1241.54	1189.17	1247.05	1241.52	1072.40	1241.52	1248.58	1140.33	1248.58	1190.29	1243.06	1129.42	1243.06	1243.85	1239.25	1243.85	1244.10	1222.38	1244.10	1241.54	1166.25
9/13/2020	1225.64	1247.95	1242.39	1196.27	1247.95	1242.41	1072.37	1242.41	1253.20	1139.62	1253.20	1187.58	1243.52	1134.68	1243.52	1244.55	1240.09	1244.55	1244.94	1224.70	1244.94	1242.39	1167.05
9/14/2020	1213.18	1247.75	1242.63	1196.12	1247.75	1241.97	1074.11	1241.97	1258.77	1140.08	1258.77	1186.59	1244.69	1135.74	1244.69	1245.97	NA	1245.97	1245.95	1224.79	1245.95	1242.63	1167.82
9/15/2020	1212.65	1247.55	1242.34	1196.22	1247.55	1241.77	1077.62	1241.77	1257.66	1140.21	1257.66	1184.90	1244.41	1134.92	1244.41	1245.57	NA	1245.57	1245.48	1224.47	1245.48	1242.34	1167.45
9/16/2020	1212.59	1247.46	1242.38	1179.59	1247.46	1241.65	1077.85	1241.65	1261.48	1140.40	1261.48	1192.72	1244.57	1119.96	1244.57	1245.59	NA	1245.59	1245.42	1224.56	1245.42	1242.38	1166.74
9/17/2020	1219.94	1248.42	1243.21	1172.14	1248.42	1242.90	1079.80	1242.90	1272.00	1140.95	1272.00	1197.06	1244.76	1112.58	1244.76	1245.66	NA	1245.66	1245.82	1225.62	1245.82	1243.21	1165.52
9/18/2020	1224.24	1248.60	1243.11	1172.73	1248.60	1243.29	1111.59	1243.29	1273.41	1141.51	1273.41	1195.91	1244.26	1112.73	1244.26	1245.05	1238.67	1245.05	1245.47	1225.82	1245.47	1243.11	1166.06
9/19/2020	1224.24	1248.60	1243.11	1172.73	1248.60	1243.29	1111.59	1243.29	1273.41	1141.51	1273.41	1195.91	1244.26	1112.73	1244.26	1245.05	1238.67	1245.05	1245.47	1225.82	1245.47	1243.11	1166.06
9/20/2020	1223.25	1247.59	1242.06	1171.57	1247.59	1242.24	1111.29	1242.24	1261.55	1141.31	1261.55	1194.06	1243.07	1112.68	1243.07	1243.89	1237.21	1243.89	1244.40	1225.47	1244.40	1242.06	1165.01
9/21/2020	1224.41	1251.34	1244.44	1123.78	1251.34	1244.90	1110.59	1244.90	1275.50	1136.84	1275.50	1112.85	1242.60	1112.68	1242.60	1244.55	1228.64	1244.55	1246.22	1201.78	1246.22	1244.44	1164.68
9/22/2020	1224.24	1250.60	1246.23	1121.74	1250.60	1244.19	1111.08	1244.19	1266.97	1135.47	1266.97	1108.56	1242.06	1112.73	1242.06	1244.11	1240.83	1244.11	1245.70	1200.46	1245.70	1246.23	NA
9/23/2020	1223.09	1249.49	1245.43	1120.20	1249.49	1242.83	1109.37	1242.83	1245.22	1132.52	1245.22	1105.71	1240.93	1112.65	1240.93	1243.09	1239.72	1243.09	1245.00	1206.05	1245.00	1245.43	NA
9/24/2020	1223.17	1249.64	1245.59	1119.87	1249.64	1242.83	1108.87	1242.83	1242.10	1130.62	1242.10	1104.28	1240.77	1112.56	1240.77	1243.00	1239						

Hydraulic Gradient - Daily Average Water Level Elevations - Observation and Recovery Wells



Notes:

Refer to the preceding Daily Average Water Level Elevation Tables (Tables 1 -3) for details on missing data points.

Hydraulic Gradient - Daily Average Water Level Elevations - Observation and Recovery Wells

Figure 1e. Q3 2020 Water Levels

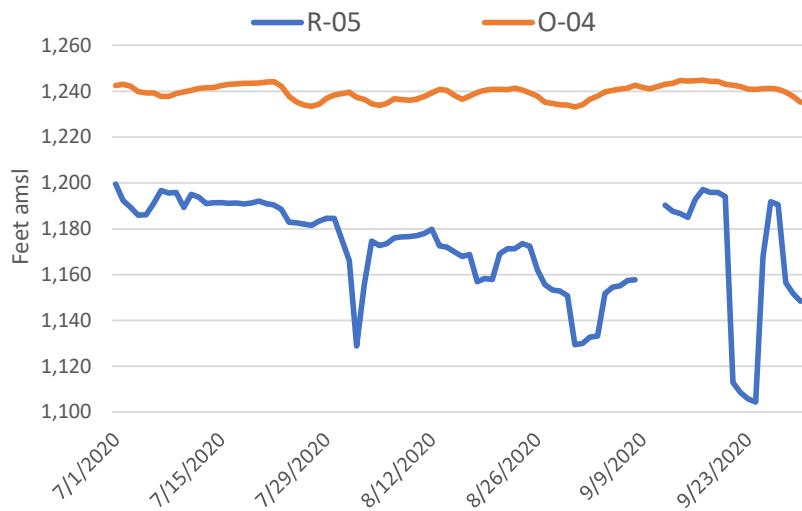


Figure 1f. Q3 2020 Water Levels

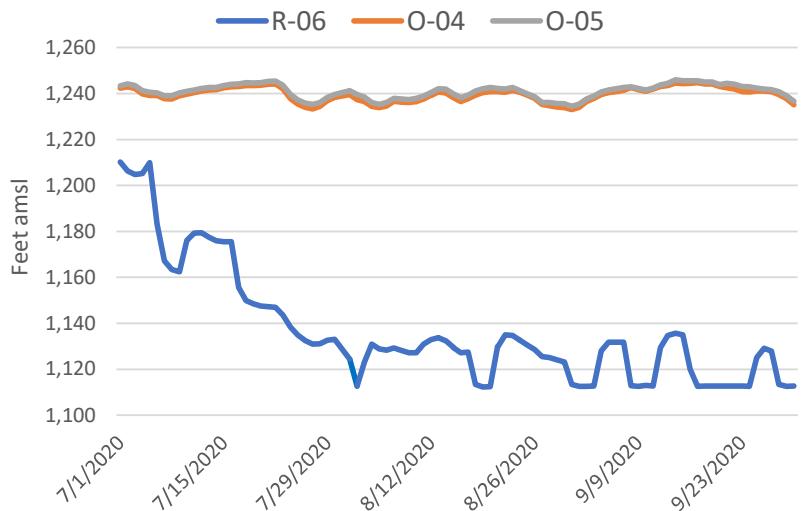


Figure 1g. Q3 2020 Water Levels

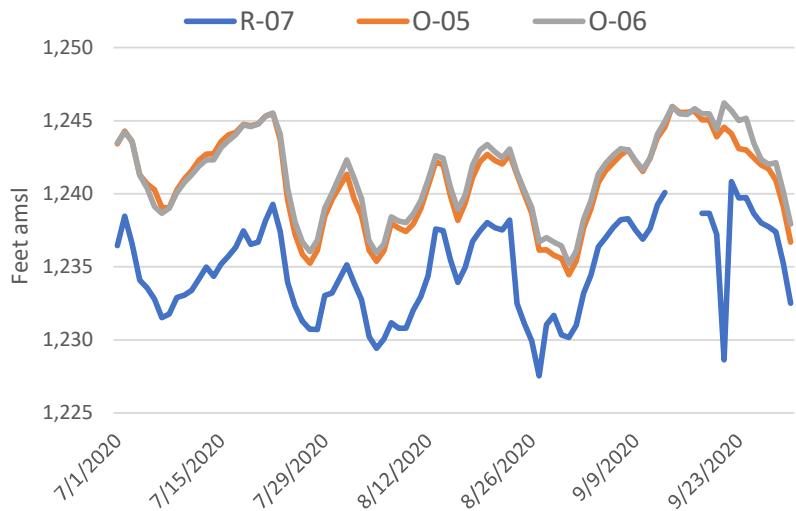
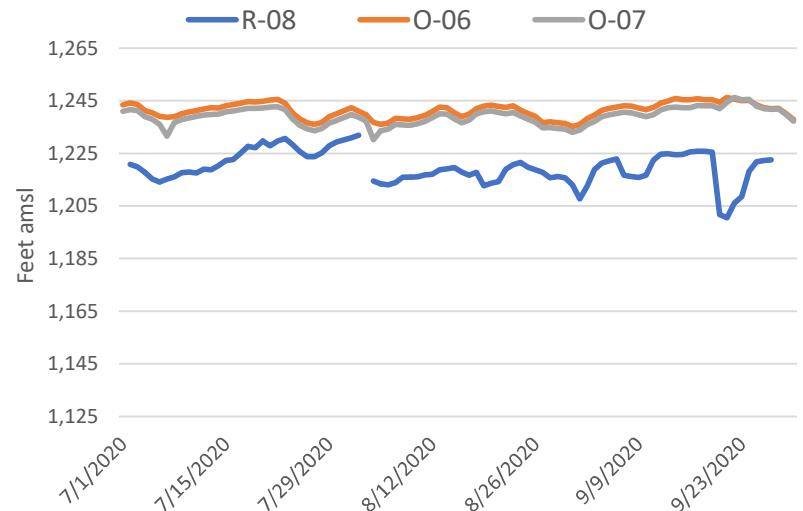


Figure 1h. Q3 2020 Water Levels



Notes:

Refer to the preceding Daily Average Water Level Elevation Tables (Tables 1 -3) for details on missing data points.

Q3 2020 DAILY HYDRAULIC GRADIENT FOR RECOVERY WELL PAIRINGS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 4. July 2020 Daily Hydraulic Gradient for Recovery Well Pairings

Date	R-01		R-02		R-03		R-04	R-05	R-06		R-07		R-08		All Gradients > 1 foot?
	O-01	O-07	O-01	O-02	O-02	O-03	O-03	O-04	O-04	O-05	O-05	O-06	O-06	O-07	
7/1/2020	17.69	15.59	35.19	33.23	121.81	NA	NA	42.99	32.23	33.20	6.96	7.03	23.57	21.10	Yes
7/2/2020	18.01	16.04	35.88	33.84	130.77	140.31	196.08	50.64	36.64	37.91	5.81	5.75	23.33	20.71	Yes
7/3/2020	17.82	15.50	33.41	31.39	132.56	141.85	200.60	52.89	37.48	38.79	6.98	7.00	23.78	21.47	Yes
7/4/2020	18.50	16.17	30.96	29.09	121.15	130.65	192.62	54.02	34.67	36.04	7.19	7.17	23.45	21.14	Yes
7/5/2020	18.01	15.84	34.63	32.59	123.78	132.83	204.84	53.11	29.25	30.69	7.11	6.84	25.23	22.88	Yes
7/6/2020	15.86	16.13	36.86	37.03	122.57	137.36	207.13	48.11	56.06	57.12	7.50	6.33	24.97	21.88	Yes
7/7/2020	17.11	16.02	39.87	38.80	112.05	123.28	179.57	41.08	70.61	71.91	7.52	7.13	23.40	20.99	Yes
7/8/2020	17.93	15.90	35.45	33.64	120.01	129.09	181.80	42.18	74.24	75.57	7.27	7.26	22.94	20.75	Yes
7/9/2020	17.77	15.99	37.79	35.87	122.75	64.53	121.40	43.21	76.63	77.82	7.36	7.18	22.40	20.15	Yes
7/10/2020	17.78	16.05	40.36	38.27	126.73	131.63	209.09	50.46	63.70	64.98	7.94	7.71	22.82	20.56	Yes
7/11/2020	17.82	15.98	44.36	42.40	131.49	131.37	201.91	45.40	61.16	62.27	8.20	7.92	23.70	21.45	Yes
7/12/2020	18.16	16.27	44.00	42.06	133.90	139.57	208.93	47.43	61.84	62.92	8.12	7.72	22.94	20.57	Yes
7/13/2020	17.79	16.01	45.63	43.67	132.50	131.93	208.77	50.62	64.04	65.17	7.72	7.32	23.52	21.05	Yes
7/14/2020	17.70	16.00	44.25	42.28	132.75	129.72	202.91	50.27	65.76	66.78	8.39	7.97	21.91	19.53	Yes
7/15/2020	17.97	16.09	43.69	41.86	133.27	138.00	211.88	51.16	66.98	67.97	8.39	7.99	20.92	18.49	Yes
7/16/2020	17.89	16.07	43.23	41.37	135.66	138.73	211.82	51.87	67.56	68.57	8.31	7.91	20.91	18.47	Yes
7/17/2020	18.22	16.40	55.95	53.99	138.70	146.43	220.02	51.84	87.49	88.54	7.86	7.70	18.94	16.54	Yes
7/18/2020	19.13	17.28	61.28	59.27	137.67	146.50	221.75	52.76	93.70	94.90	7.29	7.26	17.11	14.51	Yes
7/19/2020	18.65	16.64	60.73	58.75	137.39	146.31	221.04	52.31	95.03	96.14	8.12	8.07	17.40	14.89	Yes
7/20/2020	18.21	16.31	60.46	58.51	140.67	149.51	222.61	51.56	96.14	97.24	8.08	8.09	15.03	12.53	Yes
7/21/2020	18.39	16.63	60.72	58.59	155.90	165.04	227.03	53.09	96.74	98.00	7.15	7.12	17.38	14.72	Yes
7/22/2020	18.71	17.15	61.19	58.93	167.03	175.82	230.46	53.82	97.28	98.56	6.22	6.21	15.72	12.97	Yes
7/23/2020	18.83	16.77	52.02	49.67	165.54	171.46	228.73	53.71	98.57	100.08	6.26	6.64	13.37	10.96	Yes
7/24/2020	19.05	16.87	47.25	44.83	169.81	170.30	220.28	54.87	99.53	101.31	5.63	6.43	12.04	9.80	Yes
7/25/2020	19.10	17.25	53.30	50.84	171.73	170.11	215.39	52.87	100.60	102.44	4.93	5.76	12.43	10.07	Yes
7/26/2020	19.20	17.48	55.35	52.85	173.26	170.10	212.29	52.01	101.61	103.46	4.58	5.42	12.92	10.55	Yes
7/27/2020	21.54	19.59	48.27	45.81	173.97	170.03	211.08	51.98	102.40	104.27	4.51	5.29	12.26	9.87	Yes
7/28/2020	20.77	18.84	49.34	46.87	173.35	170.15	212.62	51.23	103.36	105.05	5.43	6.12	11.55	9.20	Yes
7/29/2020	20.24	18.36	47.72	45.29	170.46	170.43	217.88	52.39	104.30	105.81	5.40	5.98	11.12	8.67	Yes
7/30/2020	22.56	20.57	41.97	39.63	172.68	174.78	221.19	53.69	105.21	106.53	6.40	6.84	10.73	8.22	Yes
7/31/2020	18.37	16.98	61.65	59.29	176.15	178.99	222.11	54.11	106.20	107.56	6.28	6.71	10.01	7.41	Yes

Notes:

All gradient values are in feet and calculated by subtracting the recovery well groundwater elevation from the paired observation well groundwater elevation.

Groundwater elevations are presented in Tables 1 through 3.

#NA or NM = Not measured or otherwise not available

No data were available for the following dates/wells:

July 1: O-03 down for reconditioning

July 9: O-03 transducer caught above the water level; repositioned on 7/10/20

Q3 2020 DAILY HYDRAULIC GRADIENT FOR RECOVERY WELL PAIRINGS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 5. August 2020 Daily Hydraulic Gradient for Recovery Well Pairings

Date	R-01		R-02		R-03		R-04	R-05	R-06		R-07		R-08		All Gradients > 1 foot?
	O-01	O-07	O-01	O-02	O-02	O-03	O-03	O-04	O-04	O-05	O-05	O-06	O-06	O-07	
8/1/2020	18.69	17.41	58.85	56.29	178.72	181.11	222.80	73.46	115.24	117.00	6.18	7.17	10.37	7.85	Yes
8/2/2020	16.65	15.66	69.08	66.41	180.98	180.15	218.07	108.53	124.74	127.02	5.76	7.17	NA	NA	Yes
8/3/2020	17.89	16.07	54.30	51.79	179.91	179.26	217.92	80.72	113.46	115.42	5.77	6.91	25.17	22.88	Yes
8/4/2020	18.50	16.58	57.71	55.46	174.14	172.23	214.11	59.89	103.56	105.18	5.91	6.58	23.34	21.01	Yes
8/5/2020	18.17	16.44	61.34	59.08	178.02	174.80	211.79	61.19	105.09	106.57	5.96	6.56	22.90	20.57	Yes
8/6/2020	18.17	16.67	62.73	60.46	181.38	179.00	212.96	61.19	106.38	107.83	6.04	6.51	22.73	20.38	Yes
8/7/2020	20.38	18.42	52.18	50.02	180.44	180.52	217.81	60.71	107.46	108.72	6.82	7.25	22.51	20.13	Yes
8/8/2020	20.03	18.05	53.82	51.69	180.29	180.15	217.37	59.90	108.20	109.51	6.85	7.34	22.21	19.84	Yes
8/9/2020	19.65	17.66	53.37	51.22	181.11	180.45	216.79	59.52	108.86	110.19	6.61	7.23	22.00	19.68	Yes
8/10/2020	18.60	16.59	52.33	50.16	181.61	181.30	217.76	59.58	109.41	110.81	5.88	6.56	21.76	19.48	Yes
8/11/2020	19.12	17.09	53.55	51.41	176.34	177.28	219.89	59.62	106.75	108.08	6.02	6.56	22.42	20.07	Yes
8/12/2020	19.43	17.35	55.06	52.95	172.58	175.03	222.88	59.46	106.30	107.57	6.11	6.54	22.15	19.77	Yes
8/13/2020	19.32	17.37	55.21	53.01	176.13	179.21	224.80	68.26	107.09	108.51	4.59	5.01	23.51	20.97	Yes
8/14/2020	18.92	17.02	55.14	52.77	177.16	182.02	226.22	68.35	108.14	109.73	4.49	4.93	22.85	20.37	Yes
8/15/2020	18.99	16.96	55.22	53.00	178.15	178.70	220.35	68.39	108.74	110.38	4.37	4.97	22.50	20.15	Yes
8/16/2020	18.98	16.89	55.34	53.08	179.02	178.03	217.37	68.63	109.40	111.05	4.25	4.99	22.17	19.89	Yes
8/17/2020	19.02	17.01	55.49	53.22	180.25	180.50	219.48	69.14	110.39	111.90	4.41	4.95	22.15	19.84	Yes
8/18/2020	20.66	16.85	58.38	56.09	181.40	182.99	225.04	82.49	126.07	127.80	4.39	5.24	29.28	27.35	Yes
8/19/2020	22.58	18.95	NA	NA	180.70	183.47	226.80	82.18	128.19	129.96	4.74	5.54	29.34	27.19	Yes
8/20/2020	25.10	21.43	NA	NA	177.11	180.34	227.45	83.08	128.56	130.36	4.67	5.34	29.14	26.89	Yes
8/21/2020	20.37	17.67	39.67	37.44	174.84	179.01	233.14	71.78	111.03	112.48	4.59	5.18	23.85	21.53	Yes
8/22/2020	19.10	17.06	38.38	36.11	179.09	181.90	224.51	69.42	105.68	107.06	4.50	4.94	21.74	19.31	Yes
8/23/2020	19.13	17.03	39.49	37.26	179.90	183.82	226.27	70.06	106.69	108.02	4.50	4.87	21.54	19.06	Yes
8/24/2020	29.66	26.58	37.56	36.31	180.62	188.36	230.67	67.09	108.06	108.72	8.79	8.94	21.65	19.41	Yes
8/25/2020	30.32	27.08	37.45	36.22	NA	NA	228.33	66.93	108.78	109.40	8.86	9.11	21.49	19.25	Yes
8/26/2020	29.96	26.58	38.55	37.34	NA	NA	226.03	75.82	109.28	110.04	8.73	9.13	21.25	19.07	Yes
8/27/2020	29.91	26.58	37.40	36.15	NA	NA	201.47	79.55	109.70	110.61	8.61	9.17	21.04	18.98	Yes
8/28/2020	22.52	18.93	39.84	36.99	155.51	153.55	211.71	81.47	109.68	111.13	5.13	5.95	20.73	18.55	Yes
8/29/2020	20.45	16.83	41.61	37.99	154.40	150.40	212.33	81.26	109.96	111.61	4.11	5.01	20.93	18.68	Yes
8/30/2020	25.20	20.31	45.64	40.66	154.04	148.83	210.76	83.16	110.73	112.38	5.24	6.09	23.40	21.14	Yes
8/31/2020	22.52	16.72	58.98	53.63	153.42	150.73	212.66	103.61	119.62	121.03	4.27	5.03	27.52	25.32	Yes

Notes:

All gradient values are in feet and calculated by subtracting the recovery well groundwater elevation from the paired observation well groundwater elevation.

Groundwater elevations are presented in Tables 1 through 3.

#NA or NM = Not measured or otherwise not available

No data were available for the following dates/wells:

Aug 2: R-08 off for maintenance

Aug 19-20: R-02 off for maintenance

Aug 25-27: R-03 off for maintenance

Q3 2020 DAILY HYDRAULIC GRADIENT FOR RECOVERY WELL PAIRINGS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 6. September 2020 Daily Hydraulic Gradient for Recovery Well Pairings

Date	R-01		R-02		R-03		R-04	R-05	R-06		R-07		R-08		All Gradients > 1 foot?
	O-01	O-07	O-01	O-02	O-02	O-03	O-03	O-04	O-04	O-05	O-05	O-06	O-06	O-07	
9/1/2020	22.61	16.72	59.18	53.88	154.39	157.91	NA	104.25	121.61	122.89	4.39	5.08	27.56	25.31	Yes
9/2/2020	22.72	16.81	59.18	53.92	156.54	157.91	NA	103.88	124.07	125.15	4.46	5.05	27.21	24.89	Yes
9/3/2020	22.78	16.85	59.12	53.89	157.83	160.56	NA	104.73	125.28	126.35	4.53	5.10	26.93	24.57	Yes
9/4/2020	22.88	16.94	49.83	44.28	159.33	161.75	103.26	88.00	111.63	112.73	4.39	4.98	22.51	20.14	Yes
9/5/2020	22.88	17.06	48.10	42.38	159.74	162.32	103.70	85.90	108.58	109.75	4.57	5.09	20.81	18.40	Yes
9/6/2020	22.52	16.78	48.31	42.59	160.15	162.88	104.14	85.89	109.17	110.37	4.42	4.93	20.46	18.01	Yes
9/7/2020	22.47	16.76	48.30	42.58	160.57	163.84	104.97	84.07	109.67	110.86	4.41	4.84	20.19	17.72	Yes
9/8/2020	22.21	17.09	75.82	70.47	160.11	167.24	107.18	84.93	129.82	130.17	4.72	4.71	26.34	23.73	Yes
9/9/2020	22.17	17.03	76.37	70.99	167.25	175.90	108.14	NA	129.17	129.64	4.67	4.75	26.09	23.45	Yes
9/10/2020	22.12	16.95	76.55	71.20	166.72	175.19	107.42	NA	128.12	128.60	4.63	4.77	25.81	23.13	Yes
9/11/2020	22.02	16.96	76.70	71.36	167.28	166.91	98.93	NA	129.30	129.70	4.81	4.80	25.71	23.00	Yes
9/12/2020	22.56	17.05	57.88	52.35	169.12	176.18	108.25	52.77	113.64	114.43	4.60	4.85	21.72	19.16	Yes
9/13/2020	22.31	16.75	51.68	46.14	170.04	180.83	113.58	55.94	108.84	109.87	4.46	4.85	20.24	17.69	Yes
9/14/2020	34.56	29.45	51.63	45.85	167.86	184.66	118.70	58.10	108.95	110.23	NA	NA	21.16	17.84	Yes
9/15/2020	34.89	29.69	51.33	45.55	164.15	180.04	117.45	59.52	109.49	110.65	NA	NA	21.00	17.87	Yes
9/16/2020	34.87	29.79	67.87	62.06	163.80	183.63	121.08	51.85	124.61	125.63	NA	NA	20.86	17.82	Yes
9/17/2020	28.48	23.27	76.28	70.76	163.10	192.20	131.05	47.70	132.18	133.07	NA	NA	20.21	17.59	Yes
9/18/2020	24.36	18.87	75.87	70.56	131.70	161.82	131.90	48.35	131.53	132.32	6.38	6.80	19.65	17.29	Yes
9/19/2020	24.36	18.87	75.87	70.56	131.70	161.82	131.90	48.35	131.53	132.32	6.38	6.80	19.65	17.29	Yes
9/20/2020	24.34	18.82	76.02	70.67	130.94	150.25	120.24	49.01	130.40	131.22	6.68	7.19	18.93	16.59	Yes
9/21/2020	26.93	20.03	127.56	121.12	134.31	164.91	138.66	129.75	129.92	131.87	15.91	17.59	44.44	42.66	Yes
9/22/2020	26.36	21.98	128.86	122.45	133.11	155.88	131.50	133.50	129.33	131.38	3.28	4.87	45.24	45.76	Yes
9/23/2020	26.40	22.34	129.29	122.64	133.47	135.85	112.70	135.21	128.28	130.43	3.37	5.29	38.95	39.38	Yes
9/24/2020	26.47	22.42	129.77	122.96	133.96	133.22	111.47	136.49	128.21	130.44	3.27	5.44	36.58	37.01	Yes
9/25/2020	25.10	20.95	94.99	88.99	131.17	130.88	101.38	73.25	116.07	117.36	3.80	4.82	25.32	24.79	Yes
9/26/2020	24.65	20.74	79.64	74.04	129.70	129.96	97.73	49.38	112.07	112.86	3.96	4.33	20.48	20.18	Yes
9/27/2020	24.68	20.75	79.92	74.39	129.59	129.79	97.71	50.27	112.97	113.81	3.97	4.27	19.70	19.48	Yes
9/28/2020	23.33	20.12	97.16	91.46	130.12	129.64	97.46	83.19	126.27	127.56	3.52	4.71	19.52	19.27	Yes
9/29/2020	23.36	19.84	100.37	94.67	127.32	126.89	96.23	86.07	125.22	126.60	3.89	4.91	NA	NA	Yes
9/30/2020	23.44	19.50	100.23	94.67	124.21	123.58	94.51	86.83	122.52	123.98	4.18	5.40	NA	NA	Yes

Notes:

All gradient values are in feet and calculated by subtracting the recovery well groundwater elevation from the paired observation well groundwater elevation.

Groundwater elevations are presented in Tables 1 through 3.

#NA or NM = Not measured or otherwise not available

No data were available for the following dates/wells:

Sept 1-03: R-04 off for maintenance.

Sept 9-11: R-05 off for maintenance.

Sept 14-18: R-07 off for maintenance.

Sept 22-24: R-09 off for maintenance.

Sept 29-30: R-08 off for maintenance.

Hydraulic Gradient for Well Pairings

Figure 1i. Hydraulic Gradient for Wells Paired with R-01

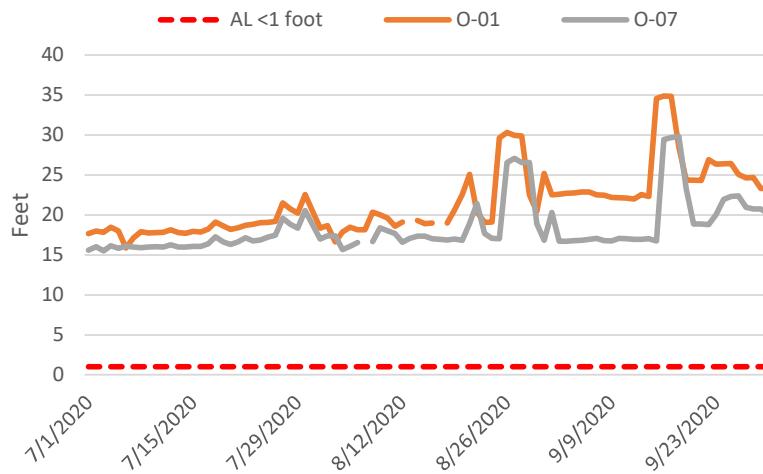


Figure 1j. Hydraulic Gradient for Wells Paired with R-02

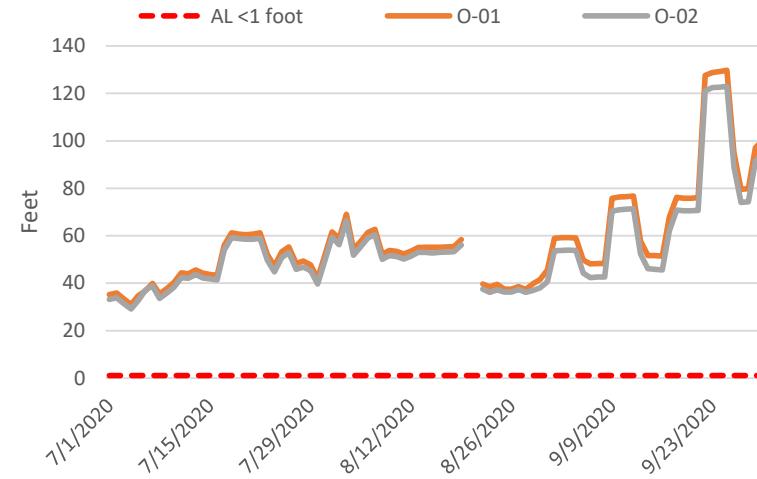


Figure 1k. Hydraulic Gradient for Wells Paired with R-03

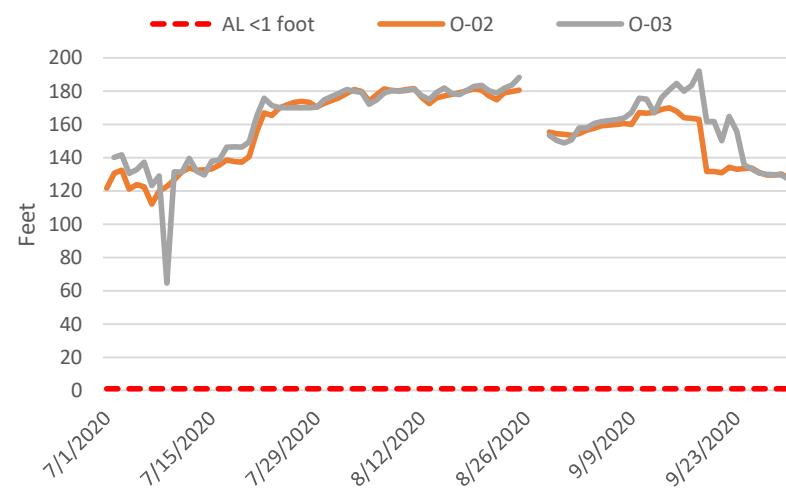
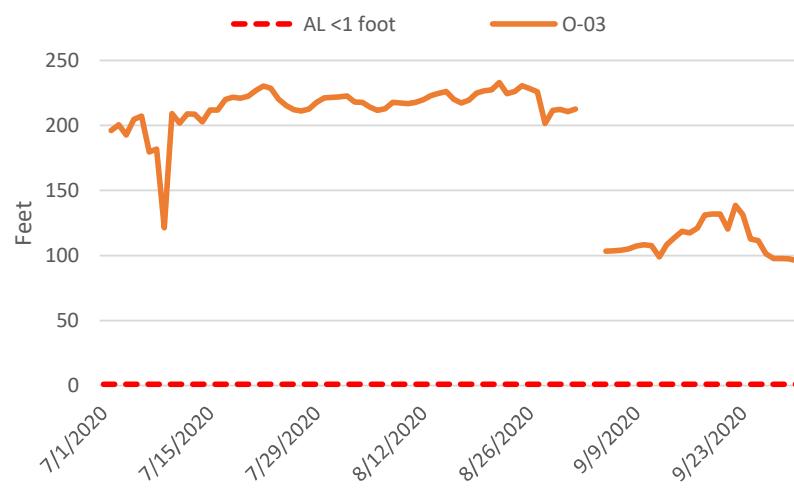


Figure 1l. Hydraulic Gradient for Wells Paired with R-04



Notes:

Refer to the preceding Daily Hydraulic Gradient for Recovery Well Pairings Tables (Tables 4 -6) for details on missing data points.

Hydraulic Gradient for Well Pairings

Figure 1m. Hydraulic Gradient for Wells Paired with R-05

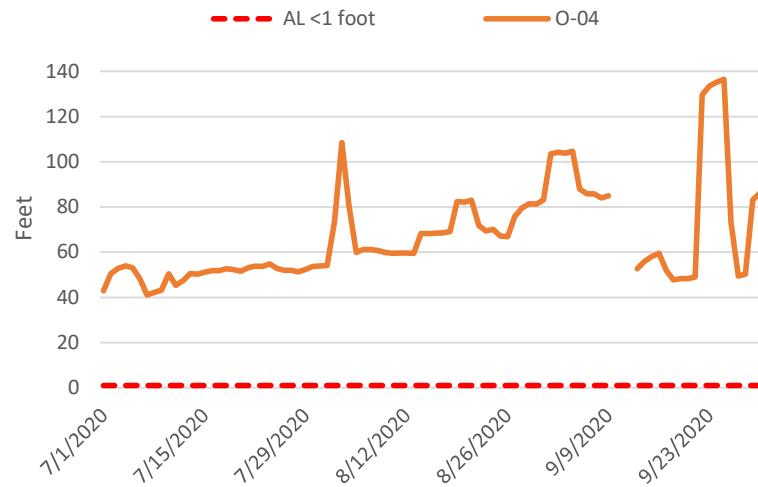


Figure 1n. Hydraulic Gradient for Wells Paired with R-06

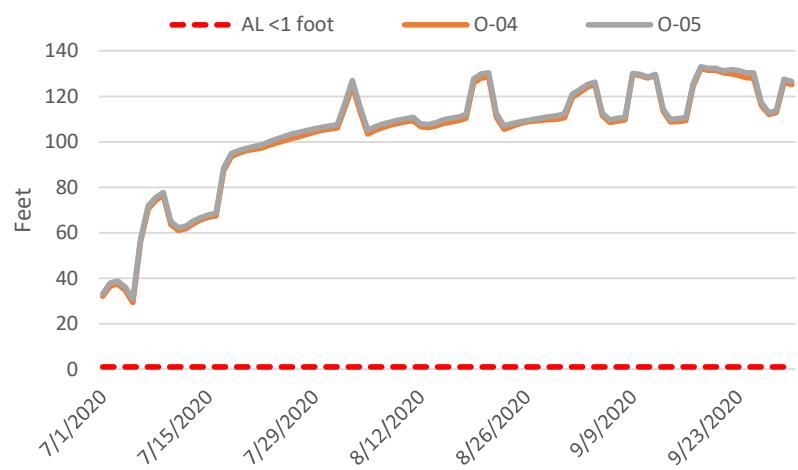


Figure 1o. Hydraulic Gradient for Wells Paired with R-07

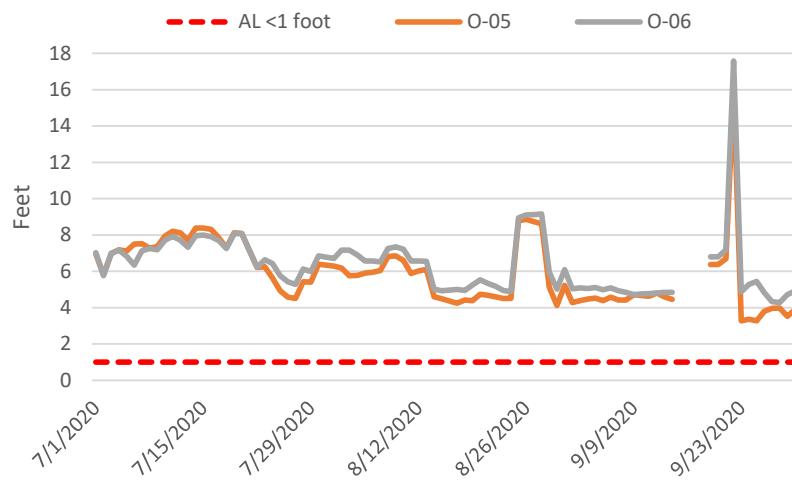
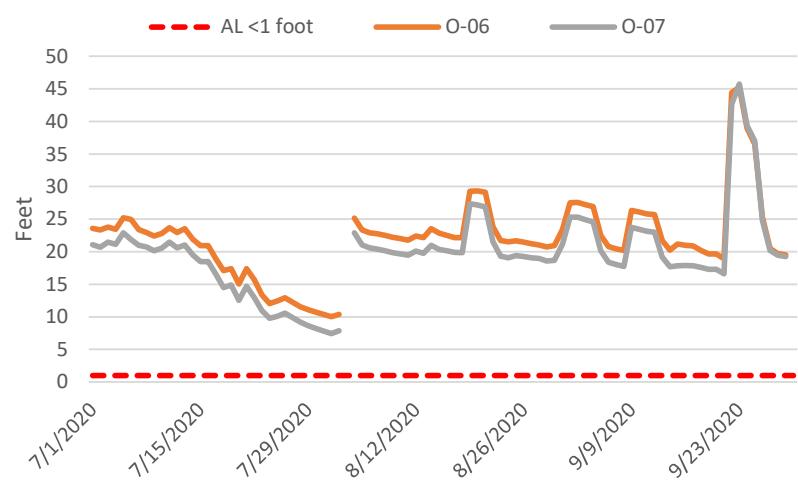


Figure 1p. Hydraulic Gradient for Wells Paired with R-08



Notes:

Refer to the preceding Daily Hydraulic Gradient for Recovery Well Pairings Tables (Tables 4 -6) for details on missing data points.

ATTACHMENT 4

Table and Graphs of Fluid Electrical Conductivity Measurements

Q3 2020 DAILY FLUID ELECTRICAL CONDUCTIVITY

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INJECTION AND OBSERVATION WELLS

FLORENCE COPPER INC.

FLORENCE, COPPER

Table 1. July 2020 Daily Fluid Electrical Conductivity Readings

Date	I-01	I-02	I-03	I-04	O-01	O-02	O-03	O-04	O-05	O-06	O-07
7/1/2020	18802	18794	18863	18820	4544	4223	7299	6529	2870	10153	4414
7/2/2020	18758	18684	18549	18612	4614	4353	NA	6644	2944	10570	4551
7/3/2020	18355	18471	18551	18511	4556	4353	NA	6724	2810	10290	4352
7/4/2020	17155	17151	17257	17258	4500	4335	NA	6936	2665	10276	4298
7/5/2020	17573	18013	17794	18053	4095	3869	NA	6194	2386	9489	4128
7/6/2020	16028	16136	16131	16165	4468	4214	15602	7003	3325	10527	4312
7/7/2020	NA	17359	17727	17785	4497	4264	15685	7746	3196	10779	3219
7/8/2020	15926	16225	16033	16333	4203	4109	15345	6506	2147	10188	3993
7/9/2020	16446	16456	16440	16450	4387	4192	12516	6136	2331	10482	4212
7/10/2020	16779	16781	16817	16821	4396	4218	11867	6230	2400	10119	4361
7/11/2020	14701	15622	15600	15422	4081	3946	12408	5404	2521	9568	4101
7/12/2020	14822	15630	15604	15444	4002	3853	11802	4815	2361	9405	3990
7/13/2020	17342	17669	17632	17756	4671	4494	12431	5606	2445	11286	4569
7/14/2020	16586	16462	16682	16496	4545	4393	12421	5496	2232	11012	4619
7/15/2020	17879	18024	17840	18800	4347	4155	11799	5048	2195	10213	4198
7/16/2020	16496	16508	16526	16681	4481	4333	11491	5376	2379	10228	4324
7/17/2020	16319	16618	16560	16991	4441	4232	11554	5230	2382	10369	4269
7/18/2020	16231	16410	16398	16387	4385	4144	12422	5138	2273	10145	4207
7/19/2020	16797	16732	16883	16906	4634	4394	12624	5238	2800	10949	4506
7/20/2020	17160	17065	17118	17224	4315	4051	11597	4961	2640	10224	4198
7/21/2020	16757	16588	16805	16714	4579	4313	12304	5083	2794	10721	4485
7/22/2020	15846	16157	16341	16465	4648	4407	11147	5519	2855	10525	4531
7/23/2020	17051	16930	16904	16909	4904	4697	11664	6054	3010	11480	5864
7/24/2020	16384	16940	16987	16975	4890	4557	10824	5816	3188	11500	4778
7/25/2020	16424	16422	16436	16434	4450	4143	11415	5634	2977	9442	4428
7/26/2020	14676	14579	14661	14650	4698	4380	11311	6015	3192	10054	4694
7/27/2020	15361	15336	15313	15398	4897	4664	11253	6266	3407	10347	4869
7/28/2020	15634	16015	15382	16091	4846	4502	10799	6187	3250	10106	4687
7/29/2020	14798	14839	15083	15052	4752	4366	10967	5341	3152	9516	4645
7/30/2020	16273	15809	15930	15963	4826	4383	11257	5025	3135	9599	4705
7/31/2020	14726	14637	14960	14831	4796	4356	10996	4798	3042	9346	4614

Notes:All measurements in microsiemens per centimeter ($\mu\text{S}/\text{cm}$)

NA or NM = Not measured or otherwise not available

July 2-5: O-03 re-development and bladder pump repair

July 7: I-01 no sample submitted

Q3 2020 DAILY FLUID ELECTRICAL CONDUCTIVITY

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INJECTION AND OBSERVATION WELLS

FLORENCE COPPER INC.

FLORENCE, COPPER

Table 2. August 2020 Daily Fluid Electrical Conductivity Readings

Date	I-01	I-02	I-03	I-04	O-01	O-02	O-03	O-04	O-05	O-06	O-07
8/1/2020	15358	15392	14957	15411	4857	4606	11293	5502	3157	9323	4715
8/2/2020	14250	14315	14317	14299	4639	4167	10290	5115	2926	10059	4240
8/3/2020	14175	14180	14245	14288	4367	4047	10461	5064	3110	10371	4301
8/4/2020	13952	14072	14048	14048	4408	4241	9846	5116	2962	10803	4267
8/5/2020	13311	13338	13388	13574	4608	4438	10526	5826	3212	11413	4564
8/6/2020	13934	13943	13959	13989	4767	4482	11326	5535	3112	10986	4675
8/7/2020	13841	13866	13839	13377	4570	4610	11289	5224	3130	10836	4711
8/8/2020	12159	12237	12224	12207	4128	4021	10484	4596	2962	9028	4617
8/9/2020	12256	12325	12339	12306	4217	3808	10539	4367	2786	8730	4316
8/10/2020	12130	12091	12099	12174	4157	3766	11121	4511	2772	8535	4048
8/11/2020	12111	12102	12095	12184	4269	3962	10393	4929	2940	9183	4150
8/12/2020	12873	12928	12922	12859	4247	3739	10285	4687	2893	8760	4135
8/13/2020	12951	13025	13073	13070	4313	3865	10462	4909	2919	9340	4126
8/14/2020	13246	13299	13360	13364	4509	4128	9930	4696	2977	9227	3988
8/15/2020	13050	13511	13555	13533	4724	4242	10218	5684	3300	10165	4560
8/16/2020	13197	13172	13784	13563	4649	4250	10923	5797	3321	10311	4524
8/17/2020	13613	13789	13759	13742	4706	4300	10605	5702	3359	10323	4548
8/18/2020	13210	13388	13464	13448	4672	4233	10011	5098	3292	10256	4462
8/19/2020	12551	12345	12360	12188	4880	4420	10478	5381	3399	10205	4653
8/20/2020	12717	12729	12622	12428	4866	4671	10678	5417	3350	10095	4654
8/21/2020	12813	12807	12717	12159	4752	4605	10375	5366	3349	9388	4757
8/22/2020	13321	13286	13335	13229	4816	4746	10325	5504	3526	9708	4840
8/23/2020	12743	12745	12795	12798	4730	4439	10623	5616	3490	9938	4565
8/24/2020	13062	13043	13063	13060	4977	4623	10461	5384	3499	10326	4828
8/25/2020	11930	12558	11583	12015	4971	4595	10675	5240	3443	10332	4940
8/26/2020	12321	12550	12588	12585	4746	4656	10786	4786	3177	9296	4495
8/27/2020	12482	12513	12400	12436	4404	4773	10080	4955	2973	8815	4228
8/28/2020	12568	12629	12576	12496	NA	4693	9055	4999	2791	8848	4219
8/29/2020	13223	12924	13095	13023	4236	4272	8266	5460	2993	8810	4126
8/30/2020	13785	13796	13774	12978	4288	4350	9154	5921	3394	9594	4452
8/31/2020	12835	12814	12991	12945	4612	4319	9163	5720	3285	9829	4463

Notes:All measurements in microsiemens per centimeter ($\mu\text{S}/\text{cm}$)

NA or NM = Not measured or otherwise not available

August 28: O-01 bladder pump repairs

Q3 2020 DAILY FLUID ELECTRICAL CONDUCTIVITY

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INJECTION AND OBSERVATION WELLS

FLORENCE COPPER INC.

FLORENCE, COPPER

Table 3. September 2020 Daily Fluid Electrical Conductivity Readings

Date	I-01	I-02	I-03	I-04	O-01	O-02	O-03	O-04	O-05	O-06	O-07
9/1/2020	12237	12673	12723	12707	4464	4288	9663	5853	3148	9542	4307
9/2/2020	12384	12390	12494	12495	4649	4425	10220	4733	3186	9575	4464
9/3/2020	12487	12695	12680	12702	4667	4418	9840	4548	3157	9242	4392
9/4/2020	12566	12568	12566	12567	4705	4476	10114	4455	3161	9180	4393
9/5/2020	12920	12966	13006	12961	4833	4587	10065	4865	3288	9295	4550
9/6/2020	12518	12615	12707	12607	4774	4605	10156	4785	3313	9415	4554
9/7/2020	11714	11833	11790	11874	4794	4532	10014	4746	3362	9777	4541
9/8/2020	11889	11930	11785	11730	4955	4658	9894	4878	3396	10125	4722
9/9/2020	12019	12086	12111	12032	4882	4643	9894	5047	3409	9864	4671
9/10/2020	11946	11978	11906	11745	4622	4404	9954	4658	3478	8835	4409
9/11/2020	12217	12383	12430	12415	4414	4204	9295	4784	3049	8794	4140
9/12/2020	13686	13756	13826	13783	5012	4845	9446	5006	3508	10130	4752
9/13/2020	13172	13637	13667	13673	4980	4756	10590	4676	3461	9725	4655
9/14/2020	12553	12748	12660	12620	4954	4626	9779	4389	3354	9679	4545
9/15/2020	10828	11157	10967	10843	4440	4682	9793	4137	3069	8772	4097
9/16/2020	11306	11462	11561	11604	4669	5285	9902	3875	2964	9253	4274
9/17/2020	12061	12305	12207	12229	4753	6235	9551	4222	3207	9203	4554
9/18/2020	12118	12290	12400	12390	4641	5154	9146	4154	3149	9209	4448
9/19/2020	11572	11988	12015	12040	4805	4815	5904	4394	3260	9206	NA
9/20/2020	11695	12201	12280	12222	4470	5651	9311	4474	3086	9679	NA
9/21/2020	11244	12097	12129	11997	4753	4727	9498	4450	3279	9378	NA
9/22/2020	11201	11199	11260	11268	4746	9455	9688	4673	3436	7878	4602
9/23/2020	10555	10647	10432	10698	4401	8262	8707	4350	3155	7025	4243
9/24/2020	10371	10684	10630	10666	4445	8982	8903	4493	3209	6251	4381
9/25/2020	10471	10155	10449	10434	5180	8212	8525	4449	3126	6226	4374
9/26/2020	11853	11975	11942	12212	6436	6922	9435	4930	3411	7585	4971
9/27/2020	11752	11884	12005	11935	6160	6247	9391	4563	3184	8752	4738
9/28/2020	12198	12312	12426	12338	5494	6724	9370	4673	3272	9106	4883
9/29/2020	11898	12046	12058	12005	6059	5422	9187	4416	3227	8912	5051
9/30/2020	12491	12188	12111	11990	6247	4978	9443	4431	3392	9423	5648

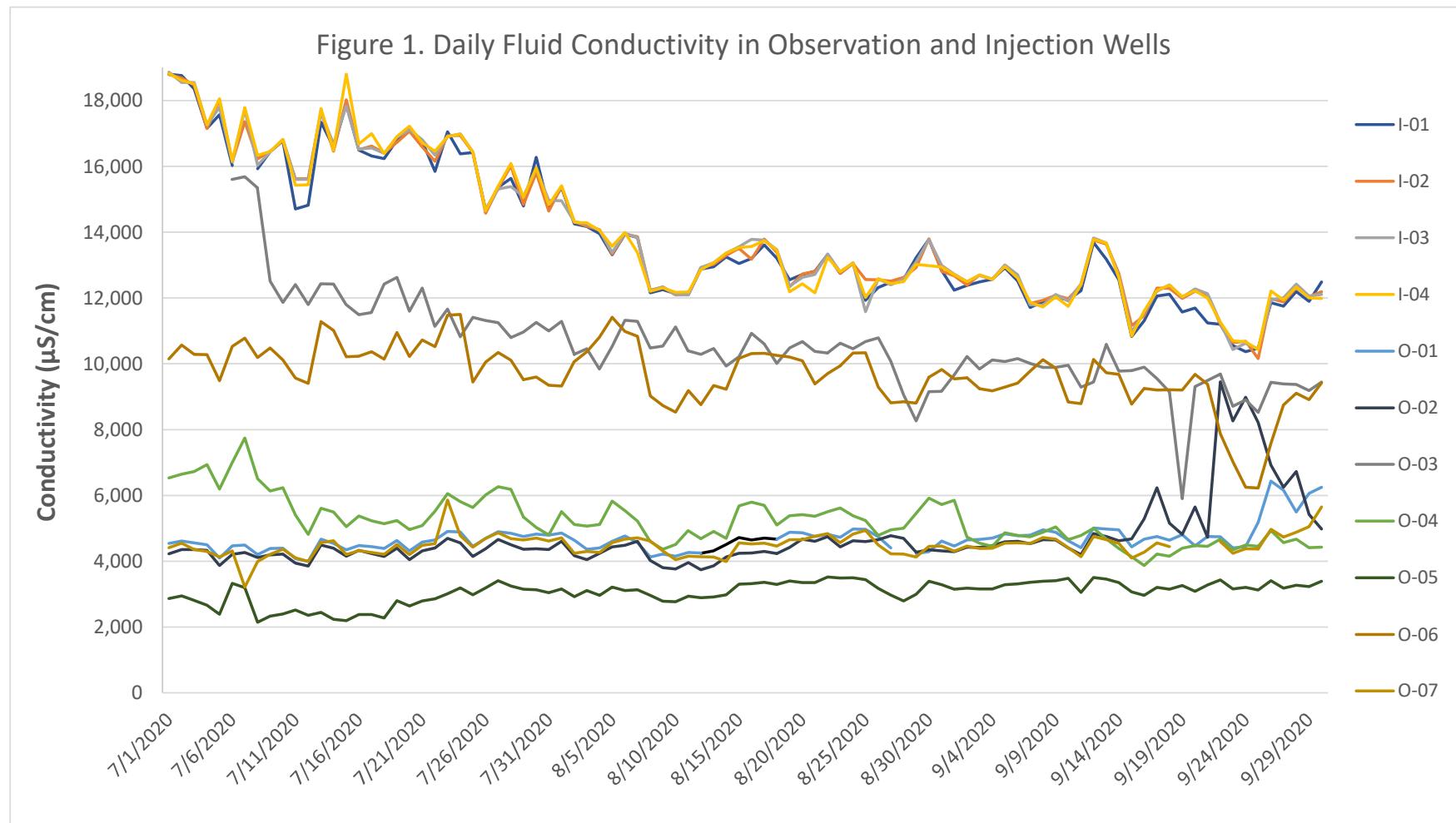
Notes:

All measurements in microsiemens per centimeter (µS/cm)

NA or NM = Not measured or otherwise not available

September 19-21: O-07 bladder pump repairs

Figure 1. Daily Fluid Conductivity in Observation and Injection Wells



ATTACHMENT 5

Table and Graphs of Bulk Electrical Conductivity Measurements

MEMORANDUM

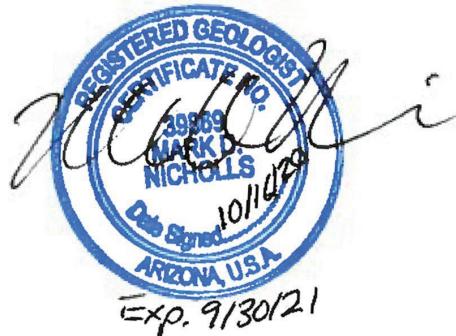
16 October 2020
File No. 132473-005

TO: Florence Copper Inc.
Mr. Brent Berg, General Manager

C: Florence Copper Inc.
Mr. Ian Ream, Senior Hydrogeologist

FROM: Haley & Aldrich, Inc.
Mark Nicholls, R.G.

SUBJECT: Summary of Bulk Electrical Conductivity Monitoring Results, Third Quarter 2020
Production Test Facility
Florence Copper Inc., Florence, Arizona



Haley & Aldrich, Inc. (Haley & Aldrich) has conducted statistical analysis of bulk electrical conductivity (EC) data collected by HydroGeophysics, Inc. at the Florence Copper Inc. (Florence Copper) Production Test Facility (PTF) located in Florence, Arizona, in accordance with Temporary Aquifer Protection Permit (Temporary APP) No. P-106360 and the Underground Injection Control (UIC) Permit No R9UIC-AZ3-FR11-1. The procedures used to complete the analysis were described in the document titled *Procedures for Determining Bulk Electrical Conductivity Alert Levels* (Haley & Aldrich, 2018)¹.

Alert levels (AL) for bulk EC were initially approved in the letter issued by the U.S. Environmental Protection Agency dated 14 December 2018 and were adopted into the Temporary APP issued by the Arizona Department of Environmental Quality (ADEQ) on 5 December 2018 and renewed on 26 November 2019. More recently, ADEQ issued an amended APP on 13 February 2020 which updated the bulk EC ALs and the definition of a bulk EC exceedance, as requested in an “Other” permit amendment submitted by Florence Copper on 17 January 2020.

¹ Haley & Aldrich, Inc., 2018. *Procedures for Determining Bulk Electrical Conductivity Alert Levels, Production Test Facility, Florence Copper Project*. August.

Alert Levels

To ensure that in-situ copper recovery fluids do not enter the Lower Basin Fill Unit (LBFU) from the Bedrock Oxide Unit, the three upper horizons (1 through 3) are monitored. The following ALs are established for these horizons:

Electrode Pair Horizon	Alert Level (ohm-meters)
Horizon 1	9.67
Horizon 2	9.89
Horizon 3	10.07

The ALs represent minimum values. Consequently, an exceedance is indicated if the measured apparent resistivity on one of these horizons is *lower* than the established AL on three adjacent or intersecting current paths.

Third Quarter 2020 Monitoring Results

Third quarter (Q3) 2020 includes 14 monitoring events for bulk EC between 2 July and 30 September 2020. Monitoring events were conducted on a weekly basis. No bulk EC AL exceedances occurred during the Q3 2020 monitoring period. Bulk EC monitoring maps for the monitoring period detail these results (Figures 1 through 14).

Data Summary

Tables 1 through 3 list the apparent resistivity results over this monitoring period for horizons 1 through 3, respectively.

Relative to the baseline dataset, no outliers were detected on these monitoring dates (defined as values over 4 times the interquartile range outside the range around the data median). As shown by the box plots presented in Attachment A and Tables 1 through 3, the grouped data from each horizon fall within the range of the baseline dataset.

Attachment B shows the data from each horizon over time, during the baseline period, and monitoring both before and after the PTF became operational. The data collected during Q3 2020 is within the established tolerance limits.

Enclosures:

- Table 1 – Bulk Electrical Conductivity Monitoring Results, Horizon 1 (40 Feet Above LBFU/Oxide Contact)
- Table 2 – Bulk Electrical Conductivity Monitoring Results, Horizon 2 (20 Feet Above LBFU/Oxide Contact)
- Table 3 – Bulk Electrical Conductivity Monitoring Results, Horizon 3 (at LBFU/Oxide Contact)
- Figure 1 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –7/2/2020, Production Test Facility
- Figure 2 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –7/8/2020, Production Test Facility
- Figure 3 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –7/15/2020, Production Test Facility
- Figure 4 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –7/22/2020, Production Test Facility
- Figure 5 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –7/29/2020, Production Test Facility
- Figure 6 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –8/6/2020, Production Test Facility
- Figure 7 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –8/14/2020, Production Test Facility
- Figure 8 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –8/20/2020, Production Test Facility
- Figure 9 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –8/28/2020, Production Test Facility
- Figure 10 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –9/3/2020, Production Test Facility
- Figure 11 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –9/11/2020, Production Test Facility
- Figure 12 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –9/17/2020, Production Test Facility
- Figure 13 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –9/24/2020, Production Test Facility
- Figure 14 – Apparent Bulk Resistivity Between Electrode Pairs by Horizon –9/30/2020, Production Test Facility
- Attachment A – Box Diagrams for Third Quarter Monitoring Data
- Attachment B – Summary Plot of Bulk Electrical Conductivity

TABLES

TABLE 1**BULK ELECTRICAL CONDUCTIVITY MONITORING RESULTS****HORIZON 1 (40 FEET ABOVE LBFU/OXIDE CONTACT)**

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Electrode 1	Electrode 2	Sending Well	Receiving Well	Apparent Resistivity ($\Omega\text{-m}$)													
				7/2/2020	7/8/2020	7/15/2020	7/22/2020	7/29/2020	8/6/2020	8/14/2020	8/20/2020	8/28/2020	9/3/2020	9/11/2020	9/17/2020	9/24/2020	9/30/2020
B-01-BC-01	B-02-BC-01	O-01	O-02	12.65	12.67	12.67	12.70	12.72	12.70	12.72	12.62	12.70	12.58	12.63	12.72	12.70	12.66
B-01-BC-01	B-03-BC1-02	O-01	O-03	11.20	11.22	11.22	11.46	11.36	11.34	11.35	11.18	11.34	11.22	11.16	11.32	11.32	11.23
B-01-BC-01	B-04-BC-01	O-01	O-04	13.30	13.32	13.34	13.52	13.48	13.47	13.48	13.28	13.48	13.22	13.23	13.43	13.46	13.33
B-01-BC-01	B-05-BC-01	O-01	O-05	12.25	12.27	12.27	12.44	12.36	12.36	12.41	12.25	12.40	12.18	12.14	12.35	12.38	12.28
B-01-BC-01	B-06-BC-01	O-01	O-06	11.71	11.71	11.71	11.83	11.82	11.81	11.81	10.91	11.81	11.65	11.59	11.78	11.82	11.74
B-01-BC-01	B-07-BC1-02	O-01	O-07	11.73	11.73	11.73	11.81	11.81	11.80	11.80	10.96	11.79	11.70	11.66	11.79	11.81	11.76
B-02-BC-01	B-03-BC1-02	O-02	O-03	10.33	10.34	10.34	10.44	10.42	10.41	10.42	10.31	10.41	10.29	10.32	10.44	10.44	10.39
B-02-BC-01	B-04-BC-01	O-02	O-04	13.90	13.91	13.92	14.12	14.08	14.08	14.09	13.90	14.06	13.88	13.85	14.09	14.11	14.00
B-02-BC-01	B-05-BC-01	O-02	O-05	13.45	13.48	13.48	13.67	13.66	13.64	13.64	13.44	13.64	13.46	13.36	13.64	13.67	13.54
B-02-BC-01	B-06-BC-01	O-02	O-06	13.37	13.39	13.38	13.57	13.57	13.55	13.55	13.37	13.55	13.39	13.29	13.56	13.58	13.45
B-02-BC-01	B-07-BC1-02	O-02	O-07	12.26	12.26	12.25	12.41	12.40	12.40	12.39	12.24	12.40	12.26	12.19	12.41	12.42	12.30
B-03-BC1-02	B-04-BC-01	O-03	O-04	12.44	12.44	12.46	12.60	12.58	12.58	12.58	12.44	12.56	12.47	12.52	12.65	12.67	12.57
B-03-BC1-02	B-05-BC-01	O-03	O-05	12.89	12.84	12.92	13.07	13.06	13.06	13.06	12.89	13.04	12.93	12.94	13.14	13.14	13.03
B-03-BC1-02	B-06-BC-01	O-03	O-06	13.97	13.98	14.00	14.20	14.19	14.17	14.17	13.97	14.13	14.01	14.07	14.26	14.30	14.14
B-03-BC1-02	B-07-BC1-02	O-03	O-07	13.20	13.19	13.21	13.42	13.39	13.37	13.37	13.19	13.36	13.25	13.27	13.46	13.49	13.35
B-04-BC-01	B-05-BC-01	O-04	O-05	10.67	10.68	10.67	10.72	10.73	10.73	10.73	10.67	10.73	10.66	10.69	10.77	10.78	10.76
B-04-BC-01	B-06-BC-01	O-04	O-06	12.06	12.06	12.05	12.19	12.17	12.17	12.18	12.06	12.18	12.05	12.12	12.28	12.30	12.20
B-04-BC-01	B-07-BC1-02	O-04	O-07	12.73	12.71	12.71	12.87	12.87	12.86	12.87	12.71	12.86	12.71	12.81	13.00	13.03	12.90
B-05-BC-01	B-06-BC-01	O-05	O-06	9.95	9.95	9.93	10.01	10.00	9.99	10.01	9.92	10.01	9.94	9.96	10.07	10.09	10.04
B-05-BC-01	B-07-BC1-02	O-05	O-07	10.74	10.73	10.74	10.87	10.84	10.83	10.85	10.74	10.85	10.72	10.75	10.93	10.96	10.87
B-06-BC-01	B-07-BC1-02	O-06	O-07	9.95	9.96	9.97	10.02	10.01	10.01	10.02	9.97	10.01	9.94	9.95	10.03	10.04	10.00

Notes $\Omega\text{-m}$ = ohm-meters

LBFU = Lower Basin Fill Unit

Oxide = Bedrock Oxide Unit

Horizon 1 Alert Level = 9.67 $\Omega\text{-m}$

TABLE 2**BULK ELECTRICAL CONDUCTIVITY MONITORING RESULTS****HORIZON 2 (20 FEET ABOVE LBFU/OXIDE CONTACT)**

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Electrode 1	Electrode 2	Sending Well	Receiving Well	Apparent Resistivity ($\Omega\text{-m}$)													
				7/2/2020	7/8/2020	7/15/2020	7/22/2020	7/29/2020	8/6/2020	8/14/2020	8/20/2020	8/28/2020	9/3/2020	9/11/2020	9/17/2020	9/24/2020	9/30/2020
B-01-BC-02	B-02-BC-02	O-01	O-02	14.41	14.42	14.39	14.47	14.47	14.46	14.46	14.43	14.44	14.35	14.39	14.44	14.46	14.43
B-01-BC-02	B-03-BC1-04	O-01	O-03	11.32	11.34	11.32	11.48	11.45	11.45	11.46	11.37	11.45	11.23	11.28	11.41	11.44	11.37
B-01-BC-02	B-04-BC-02	O-01	O-04	13.26	13.30	13.28	13.46	13.44	13.44	13.44	13.31	13.41	13.16	13.16	13.39	13.40	13.28
B-01-BC-02	B-05-BC-02	O-01	O-05	12.16	12.19	12.18	12.33	12.30	12.28	12.31	12.20	12.29	12.08	12.03	12.26	12.28	12.19
B-01-BC-02	B-06-BC-02	O-01	O-06	11.60	11.61	11.61	11.74	11.77	11.76	11.67	11.66	11.71	11.54	11.51	11.69	11.72	11.63
B-01-BC-02	B-07-BC1-04	O-01	O-07	11.74	11.72	11.72	11.81	11.80	11.78	11.79	11.74	11.79	11.68	11.66	11.78	11.79	11.76
B-02-BC-02	B-03-BC1-04	O-02	O-03	10.98	11.00	10.98	11.06	11.08	11.06	11.08	10.97	11.03	10.95	10.98	11.06	11.10	11.02
B-02-BC-02	B-04-BC-02	O-02	O-04	14.03	14.04	14.03	14.22	14.20	14.20	14.21	14.01	14.17	13.99	13.96	14.22	14.23	14.10
B-02-BC-02	B-05-BC-02	O-02	O-05	13.52	13.55	13.55	13.73	13.71	13.71	13.68	13.51	13.69	13.54	13.44	13.73	13.74	13.62
B-02-BC-02	B-06-BC-02	O-02	O-06	13.40	13.46	13.46	13.64	13.63	13.61	13.60	13.43	13.61	13.44	13.35	13.64	13.65	13.52
B-02-BC-02	B-07-BC1-04	O-02	O-07	12.32	12.29	12.29	12.41	12.41	12.41	12.40	12.26	12.39	12.30	12.22	12.43	12.44	12.35
B-03-BC1-04	B-04-BC-02	O-03	O-04	12.38	12.44	12.47	12.57	12.58	12.58	12.56	12.44	12.58	12.42	12.50	12.65	12.67	12.57
B-03-BC1-04	B-05-BC-02	O-03	O-05	12.79	12.80	12.84	12.96	12.96	12.95	12.95	12.81	12.96	12.78	12.85	13.03	13.05	12.94
B-03-BC1-04	B-06-BC-02	O-03	O-06	13.87	13.90	13.92	14.13	14.10	14.09	14.07	13.91	14.07	13.86	13.97	14.18	14.22	14.08
B-03-BC1-04	B-07-BC1-04	O-03	O-07	13.05	13.02	13.04	13.21	13.21	13.19	13.19	13.02	13.14	13.00	13.09	13.27	13.30	13.18
B-04-BC-02	B-05-BC-02	O-04	O-05	11.02	11.01	11.02	11.08	11.08	11.08	11.07	11.01	11.04	11.02	11.04	11.10	11.12	11.09
B-04-BC-02	B-06-BC-02	O-04	O-06	12.07	12.05	12.06	12.19	12.16	12.16	12.18	12.05	12.17	12.03	12.11	12.27	12.30	12.20
B-04-BC-02	B-07-BC1-04	O-04	O-07	12.56	12.53	12.53	12.71	12.71	12.69	12.68	12.52	12.65	12.54	12.60	12.81	12.84	12.72
B-05-BC-02	B-06-BC-02	O-05	O-06	10.14	10.16	10.13	10.24	10.22	10.21	10.23	10.15	10.22	10.15	10.18	10.28	10.31	10.24
B-05-BC-02	B-07-BC1-04	O-05	O-07	10.59	10.59	10.59	10.71	10.70	10.69	10.70	10.58	10.70	10.58	10.61	10.78	10.80	10.73
B-06-BC-02	B-07-BC1-04	O-06	O-07	10.73	10.72	10.74	10.77	10.78	10.78	10.77	10.74	10.76	10.73	10.72	10.80	10.80	10.78

Notes $\Omega\text{-m}$ = ohm-meters

LBFU = Lower Basin Fill Unit

Oxide = Bedrock Oxide Unit

Horizon 2 Alert Level = 9.89 $\Omega\text{-m}$

TABLE 3

BULK ELECTRICAL CONDUCTIVITY MONITORING RESULTS

HORIZON 3 (AT LBFU/OXIDE CONTACT)

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Electrode 1	Electrode 2	Sending Well	Receiving Well	Apparent Resistivity ($\Omega\text{-m}$)													
				7/2/2020	7/8/2020	7/15/2020	7/22/2020	7/29/2020	8/6/2020	8/14/2020	8/20/2020	8/28/2020	9/3/2020	9/11/2020	9/17/2020	9/24/2020	9/30/2020
B-01-BC-03	B-02-BC-03	O-01	O-02	15.26	15.25	15.24	15.30	15.33	15.31	15.33	15.21	15.33	15.25	15.25	15.32	15.32	15.30
B-01-BC-03	B-03-BC2-02	O-01	O-03	11.41	11.40	11.54	11.67	11.65	11.65	11.65	11.52	11.65	11.47	11.49	11.63	11.65	11.58
B-01-BC-03	B-04-BC-03	O-01	O-04	13.22	13.22	13.23	13.43	13.40	13.40	13.41	13.26	13.39	13.19	13.11	13.36	13.38	13.28
B-01-BC-03	B-05-BC-03	O-01	O-05	12.10	12.08	12.11	12.27	12.26	12.26	12.25	12.12	12.24	12.09	11.97	12.21	12.22	12.14
B-01-BC-03	B-06-BC-03	O-01	O-06	11.49	11.48	11.50	11.63	11.60	11.59	11.61	11.49	11.59	11.48	11.39	11.58	11.60	11.53
B-01-BC-03	B-07-BC2-02	O-01	O-07	11.96	11.96	11.97	12.06	12.05	12.04	12.04	11.97	12.03	11.97	11.92	12.04	12.06	12.01
B-02-BC-03	B-03-BC2-02	O-02	O-03	11.32	11.33	10.76	10.89	10.88	10.88	10.91	10.79	10.91	10.77	10.79	10.92	10.93	10.87
B-02-BC-03	B-04-BC-03	O-02	O-04	13.95	13.91	13.92	14.12	14.08	14.11	14.09	13.87	14.08	13.89	13.84	14.10	14.12	14.01
B-02-BC-03	B-05-BC-03	O-02	O-05	13.44	13.43	13.45	13.64	13.59	13.57	13.57	13.38	13.59	13.42	13.33	13.59	13.61	13.50
B-02-BC-03	B-06-BC-03	O-02	O-06	13.29	13.33	13.37	13.54	13.50	13.49	13.50	13.30	13.49	13.33	13.24	13.50	13.53	13.41
B-02-BC-03	B-07-BC2-02	O-02	O-07	12.38	12.31	12.38	12.51	12.49	12.48	12.50	12.35	12.47	12.37	12.31	12.51	12.53	12.46
B-03-BC2-02	B-04-BC-03	O-03	O-04	12.36	12.38	12.43	12.56	12.53	12.53	12.52	12.39	12.52	12.27	12.45	12.63	12.64	12.54
B-03-BC2-02	B-05-BC-03	O-03	O-05	12.79	12.79	13.26	13.42	13.40	13.38	13.37	13.20	13.34	13.16	13.23	13.42	13.48	13.34
B-03-BC2-02	B-06-BC-03	O-03	O-06	13.94	13.91	14.76	14.90	14.89	14.88	14.87	14.64	14.95	14.58	14.71	14.92	14.96	14.81
B-03-BC2-02	B-07-BC2-02	O-03	O-07	13.00	13.00	13.69	13.84	13.82	13.80	13.80	13.60	13.77	13.53	13.68	13.86	13.89	13.74
B-04-BC-03	B-05-BC-03	O-04	O-05	11.64	11.65	11.66	11.73	11.73	11.73	11.71	11.67	11.72	11.66	11.70	11.77	11.79	11.76
B-04-BC-03	B-06-BC-03	O-04	O-06	12.14	12.15	12.15	12.31	12.28	12.24	12.27	12.15	12.18	12.15	12.21	12.38	12.41	12.32
B-04-BC-03	B-07-BC2-02	O-04	O-07	12.42	12.43	12.43	12.60	12.59	12.59	12.59	12.42	12.57	12.44	12.56	12.70	12.74	12.63
B-05-BC-03	B-06-BC-03	O-05	O-06	10.42	10.38	10.43	10.50	10.47	10.47	10.47	10.46	10.48	10.37	10.43	10.55	10.55	10.52
B-05-BC-03	B-07-BC2-02	O-05	O-07	10.47	10.45	10.46	10.60	10.57	10.57	10.57	10.53	10.66	10.42	10.49	10.67	10.68	10.59
B-06-BC-03	B-07-BC2-02	O-06	O-07	10.95	10.94	10.93	11.01	10.99	10.98	10.97	10.93	10.98	10.92	10.93	11.00	11.01	10.98

Notes

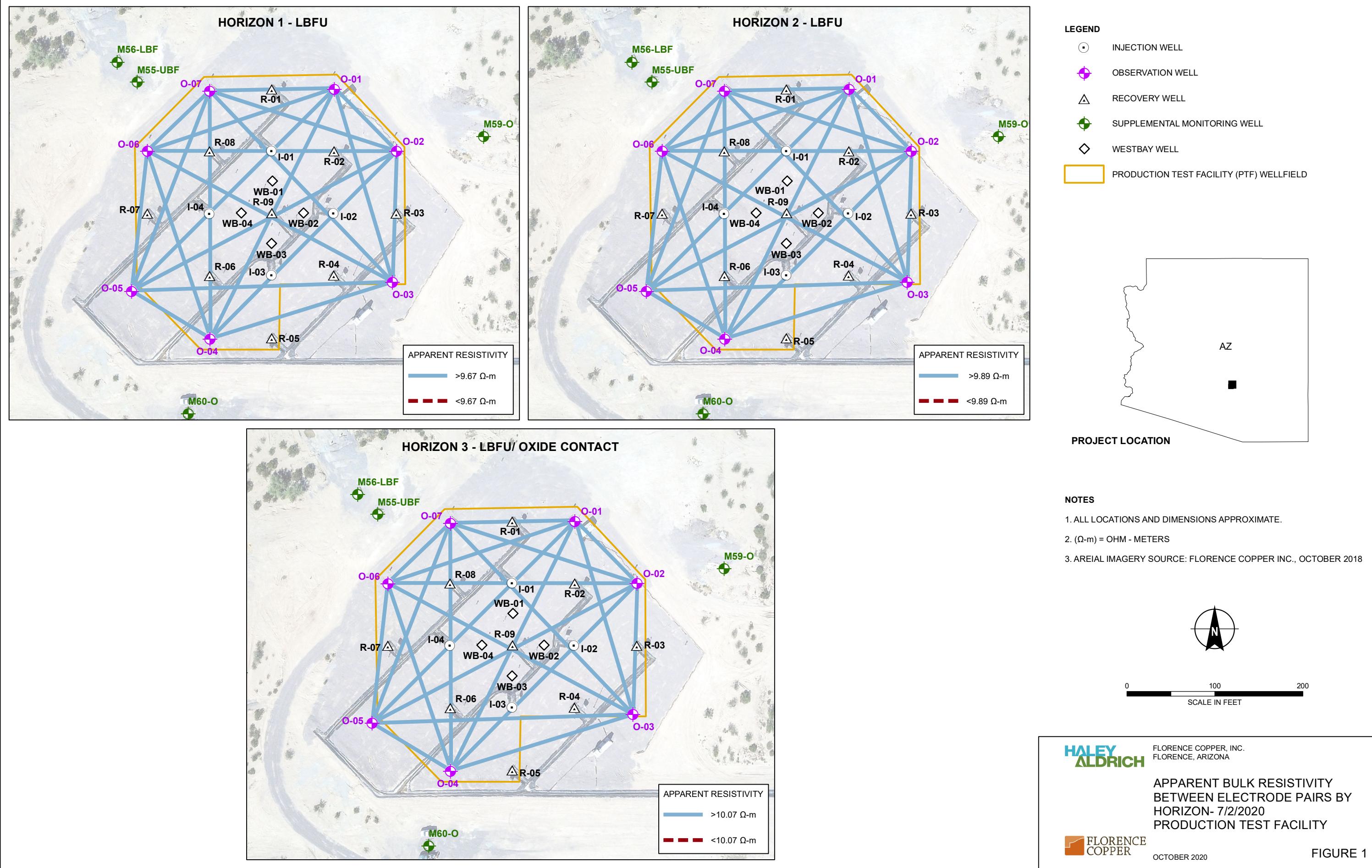
 $\Omega\text{-m}$ = ohm-meters

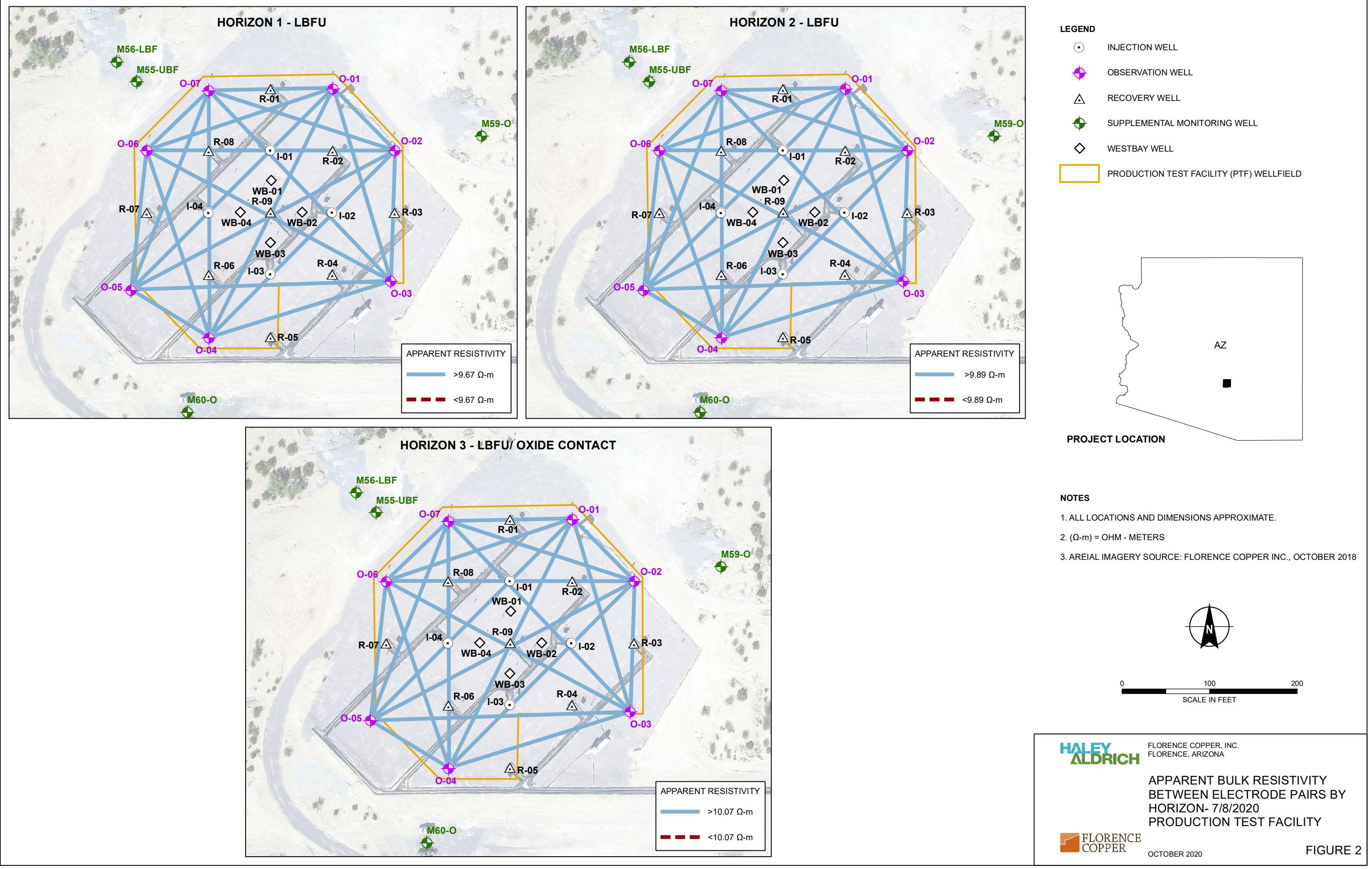
LBFU = Lower Basin Fill Unit

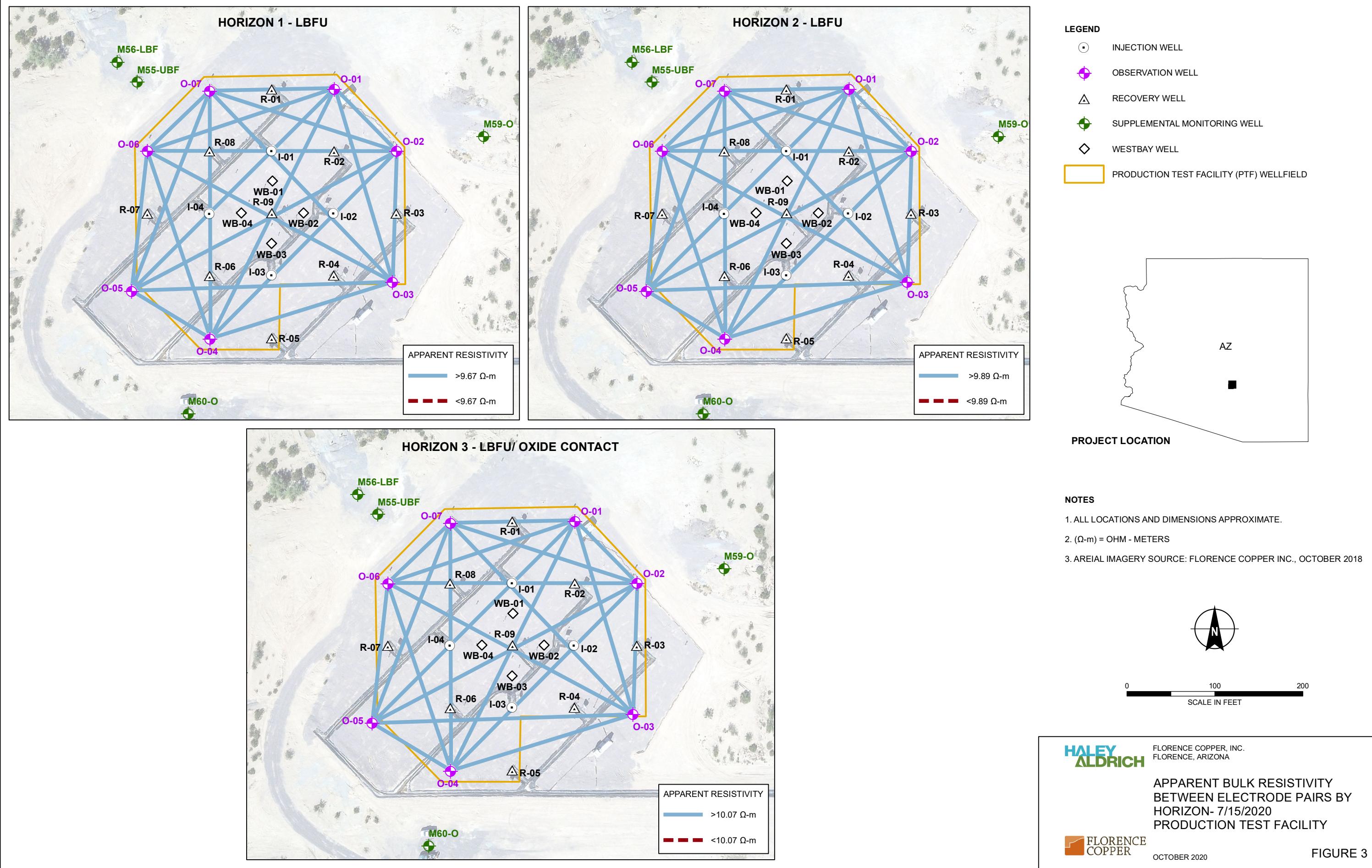
Oxide = Bedrock Oxide Unit

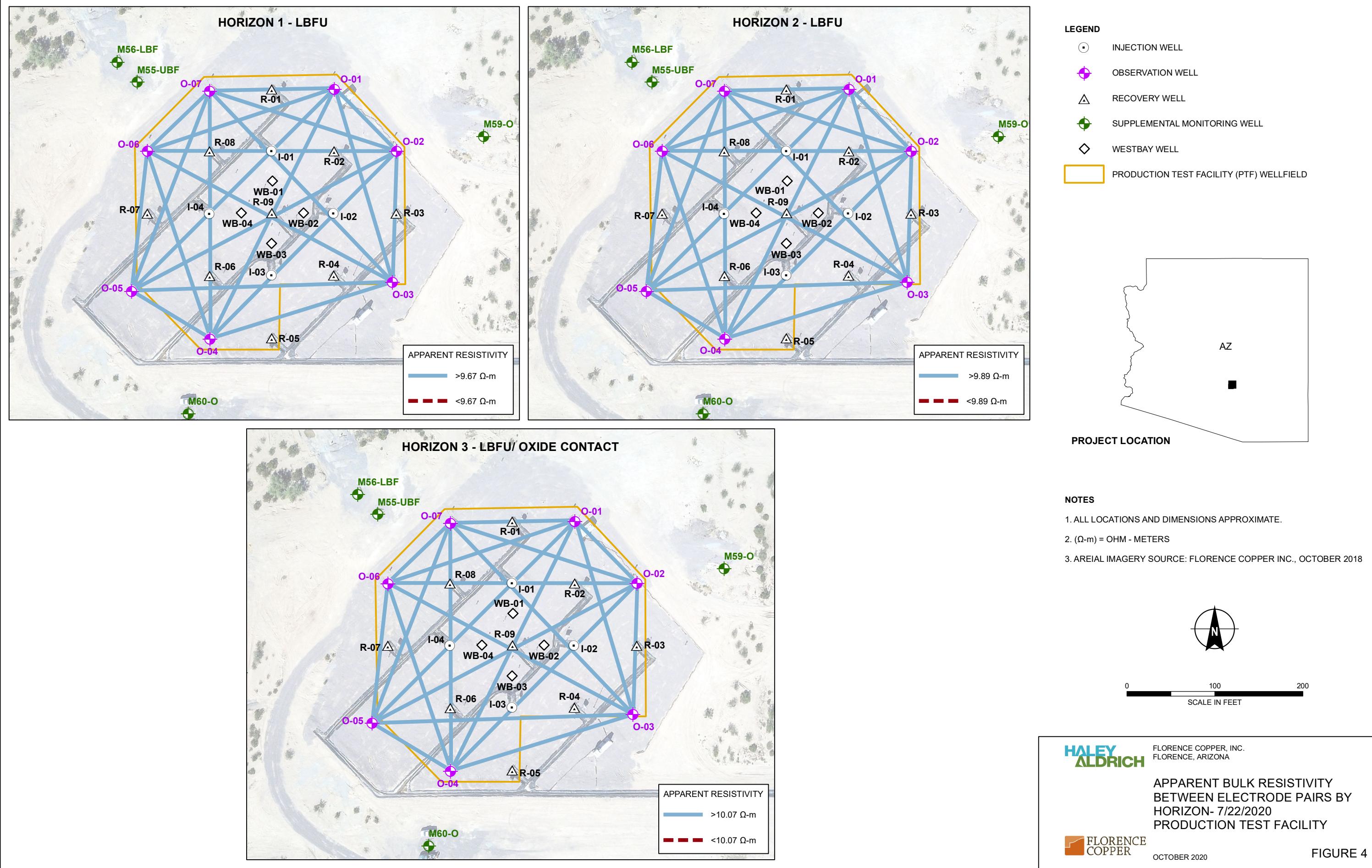
Horizon 3 Alert Level = 10.07 $\Omega\text{-m}$

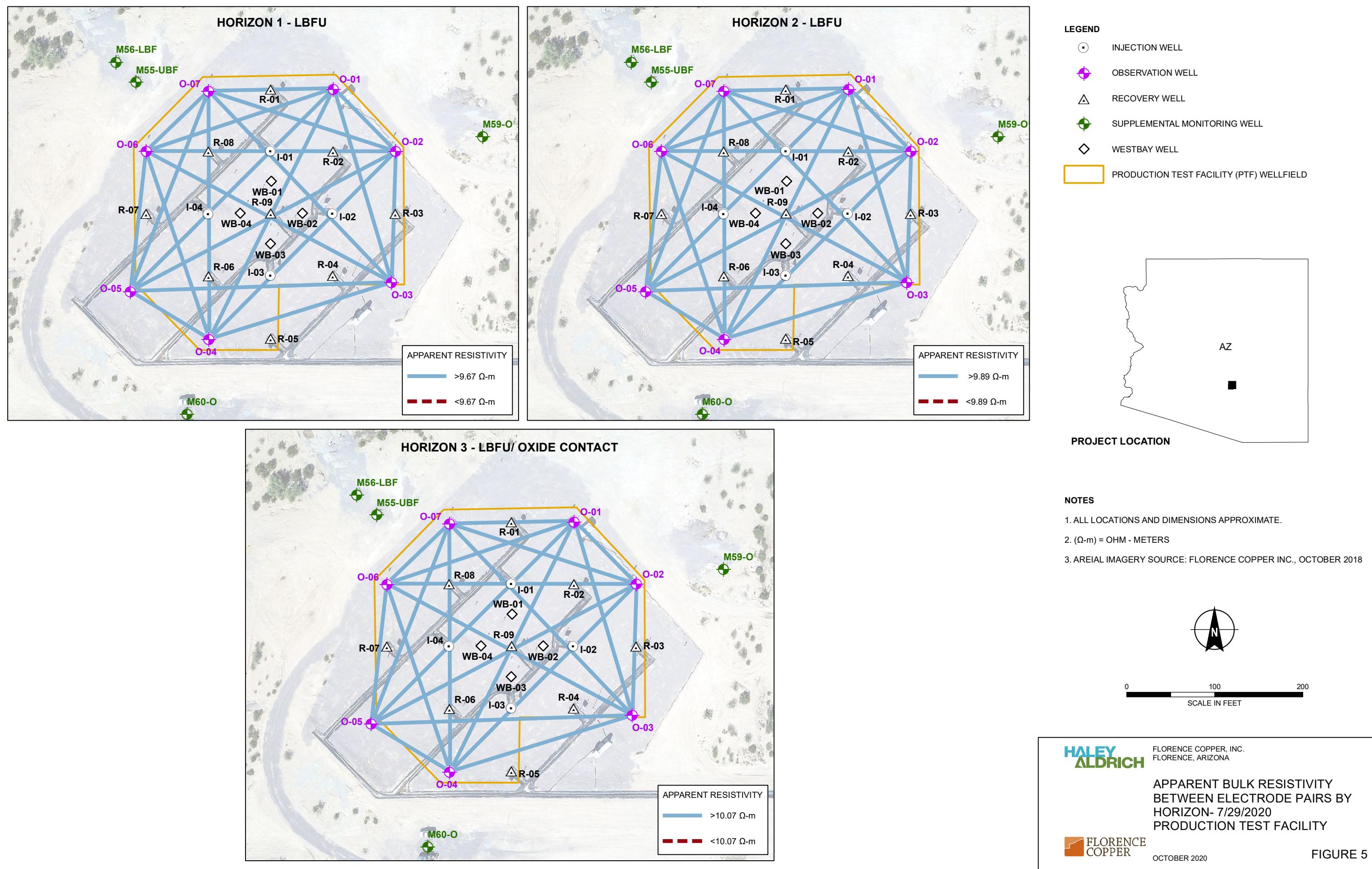
FIGURES

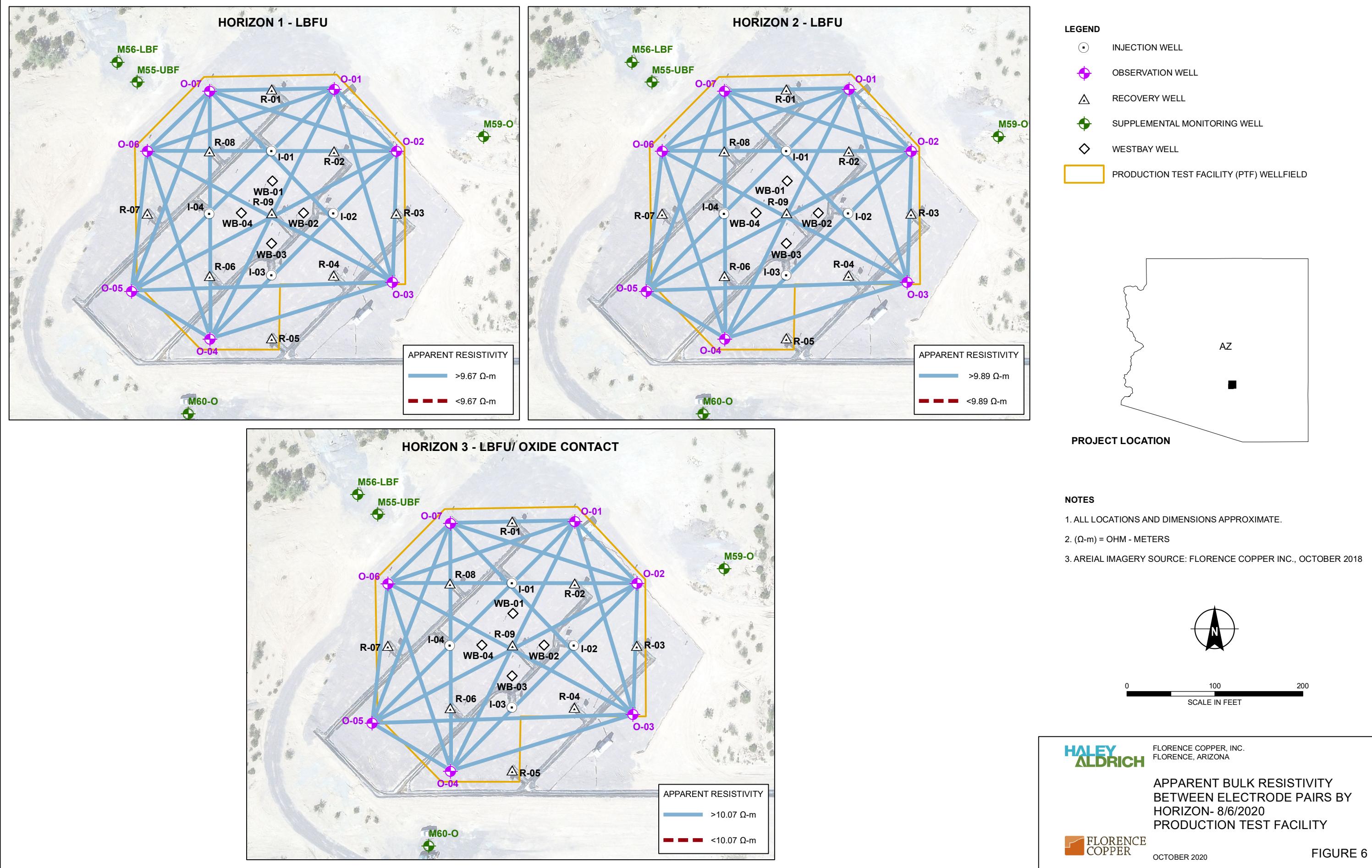


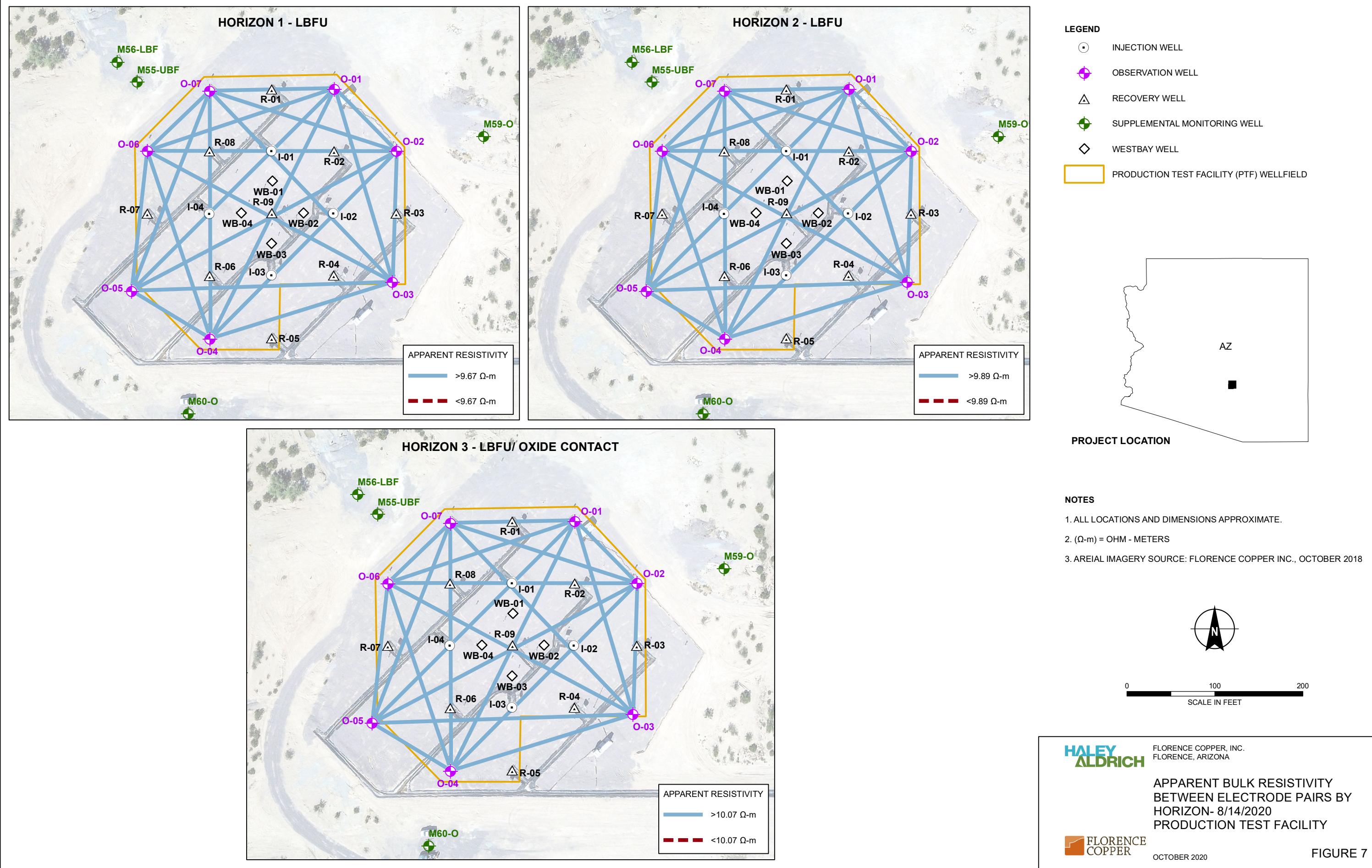


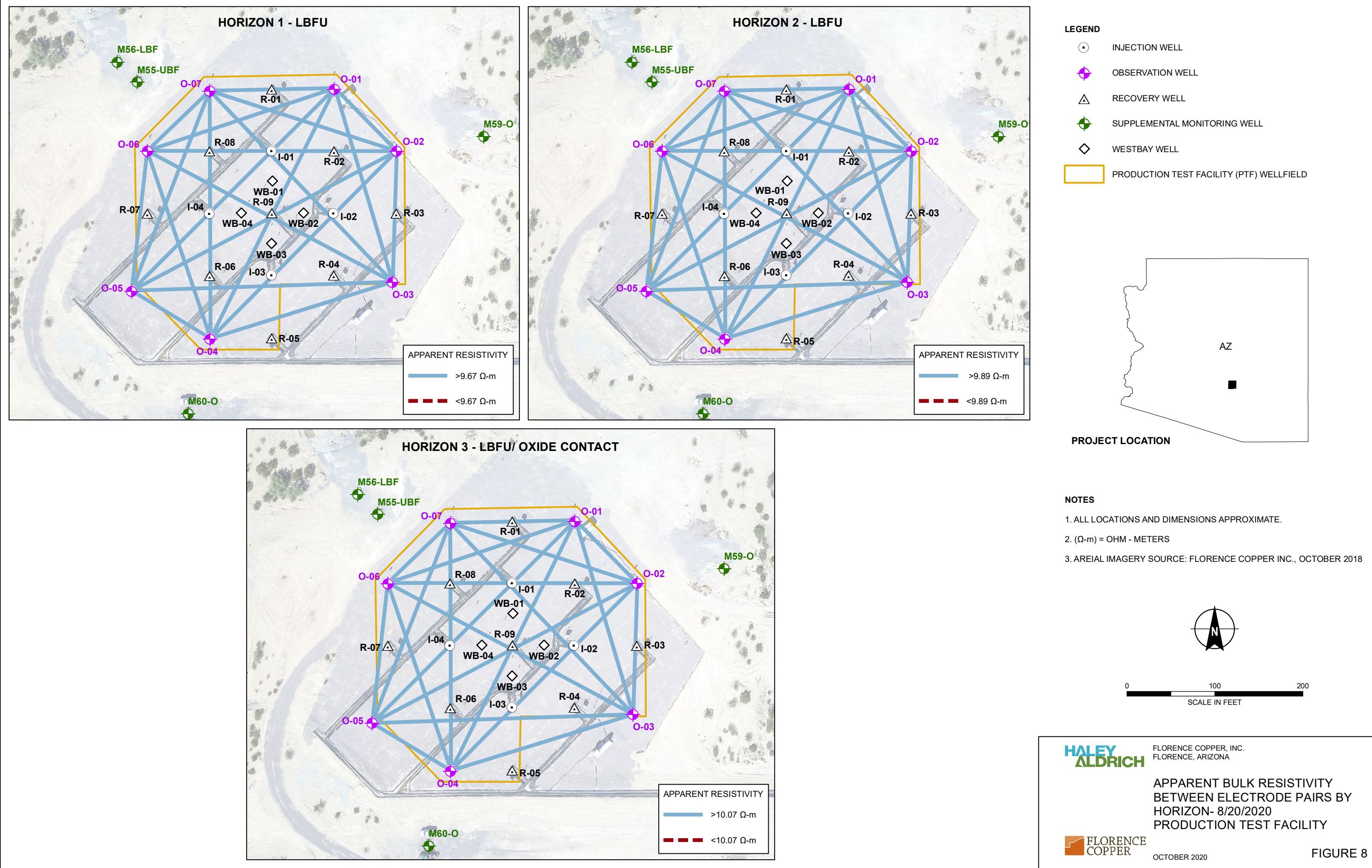


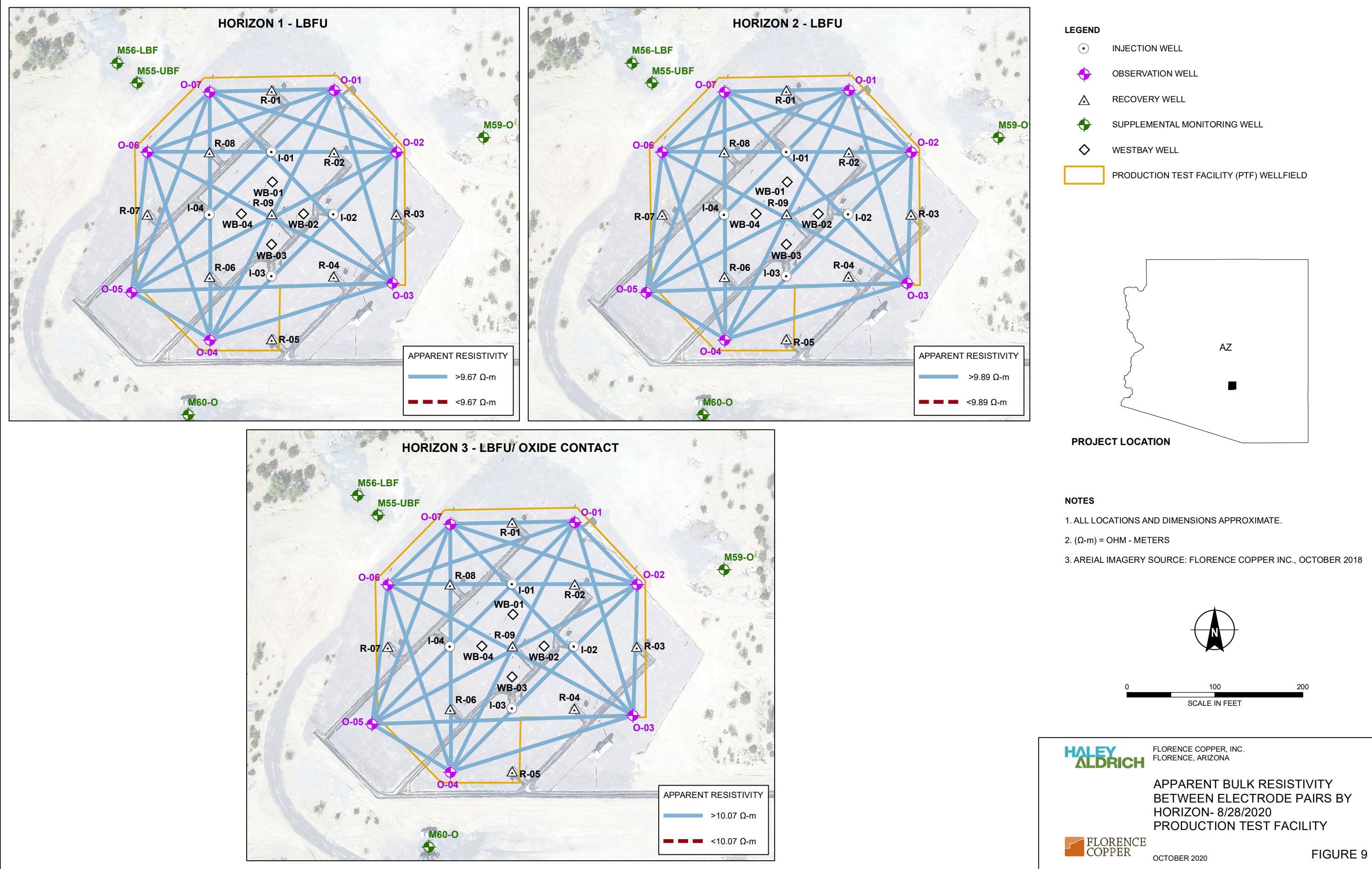


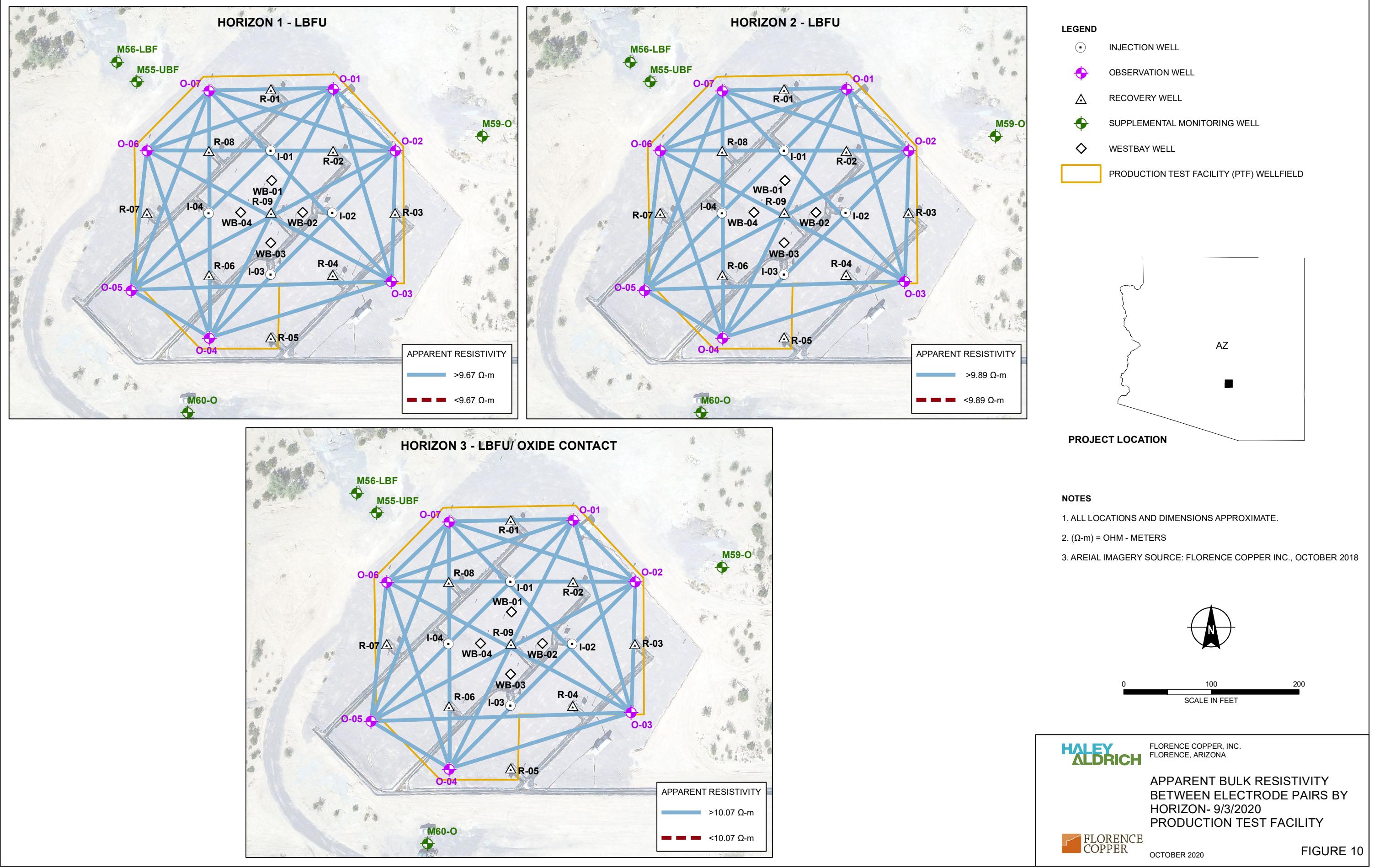


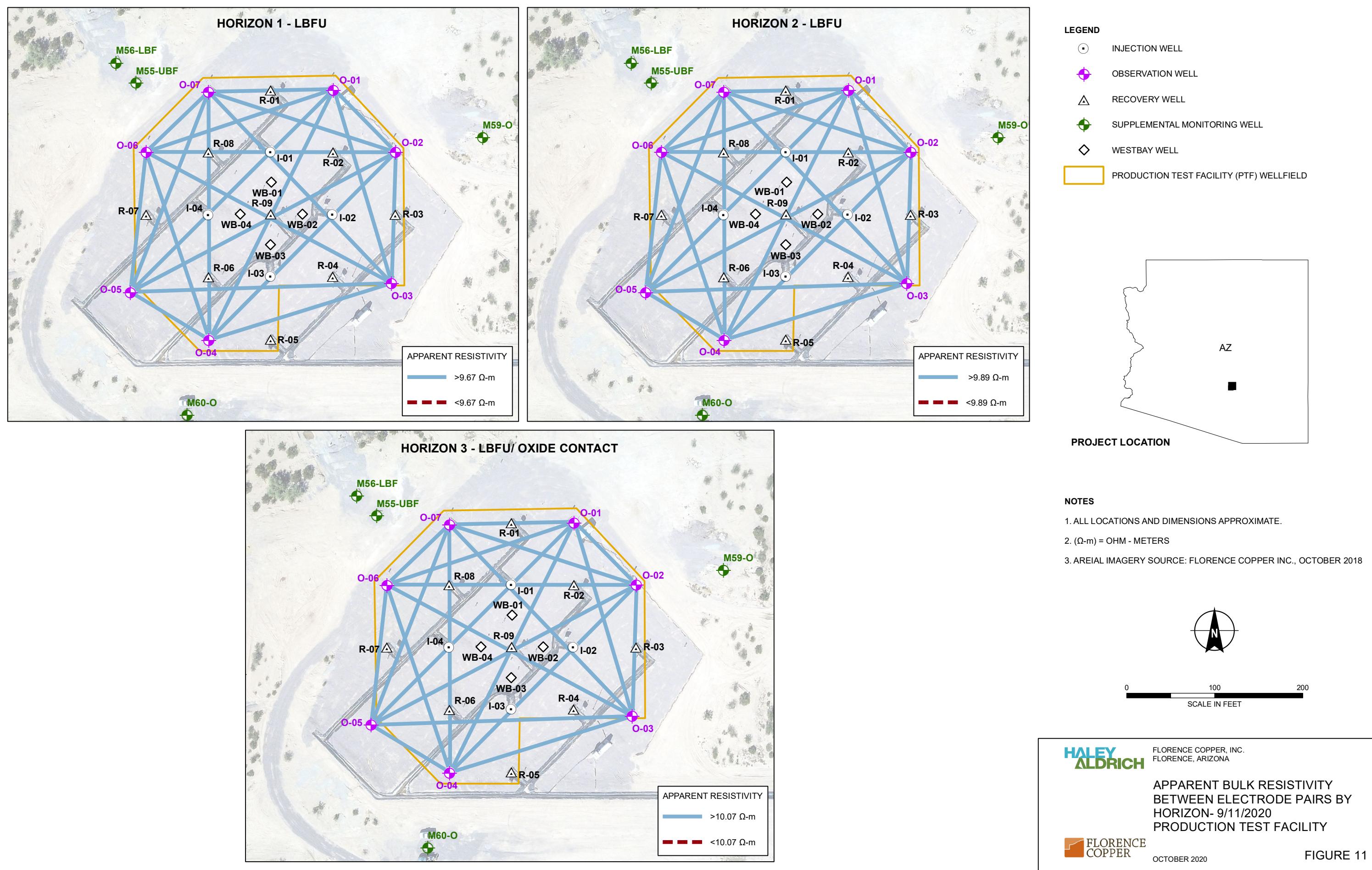


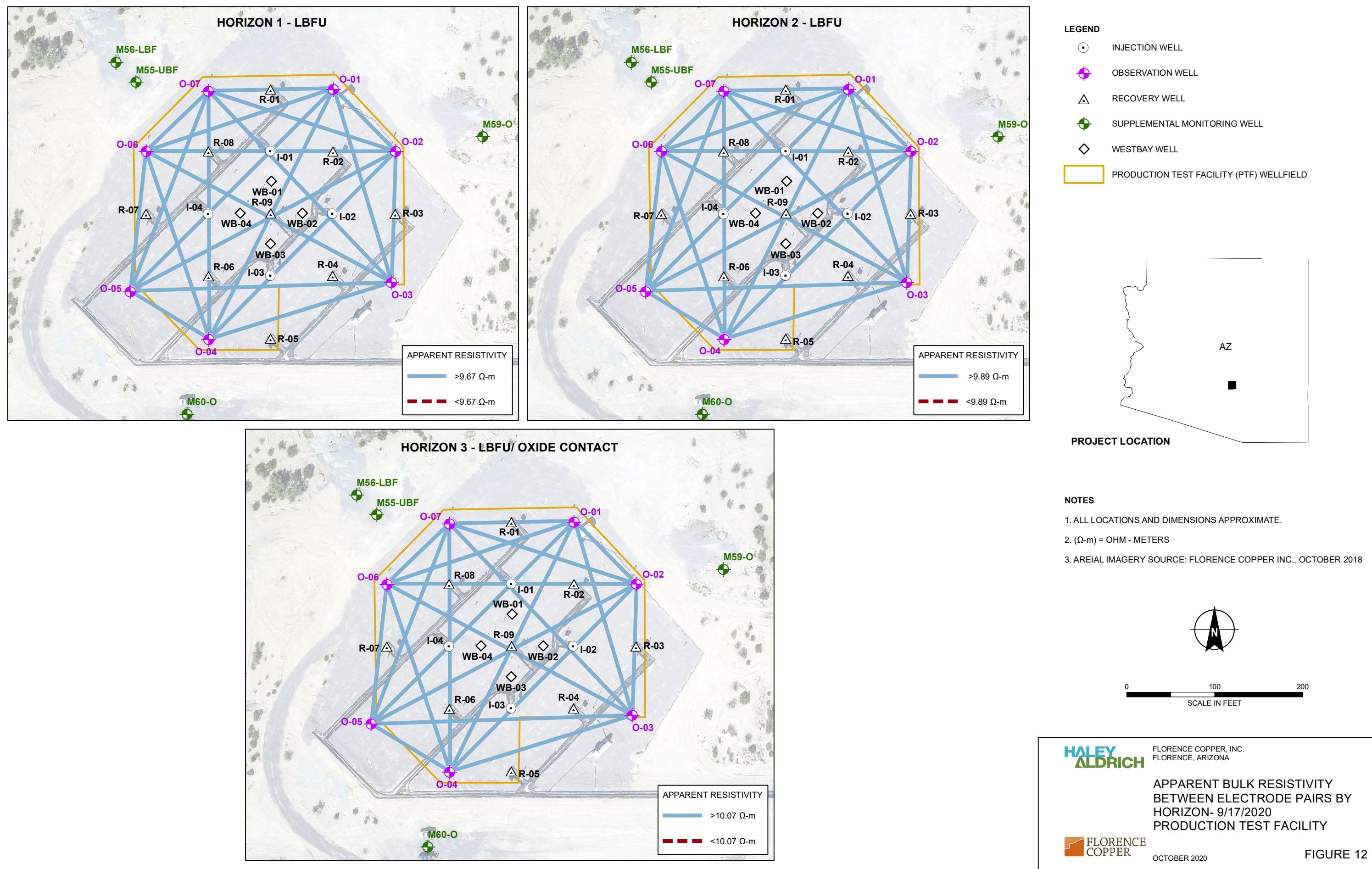


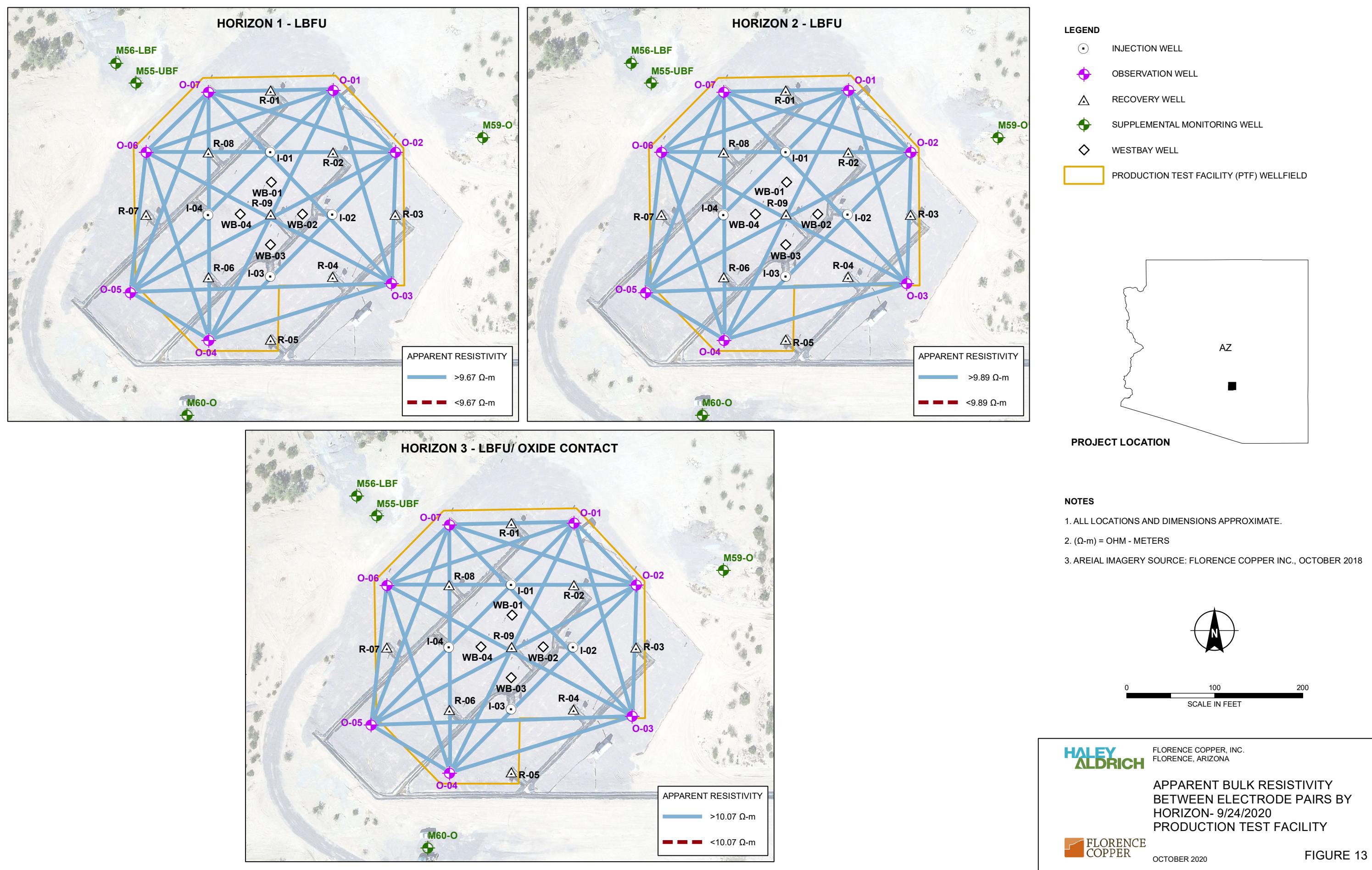


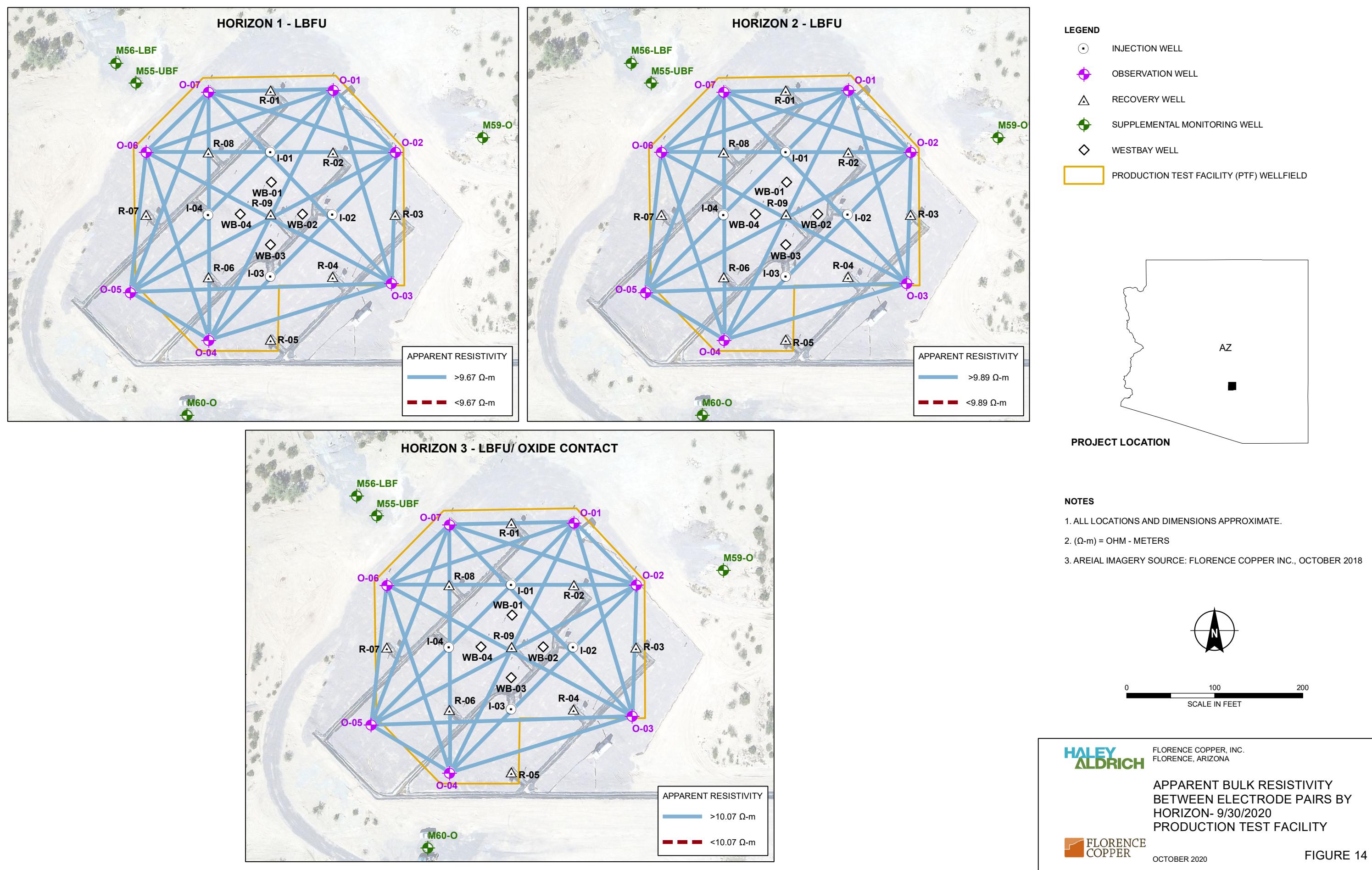










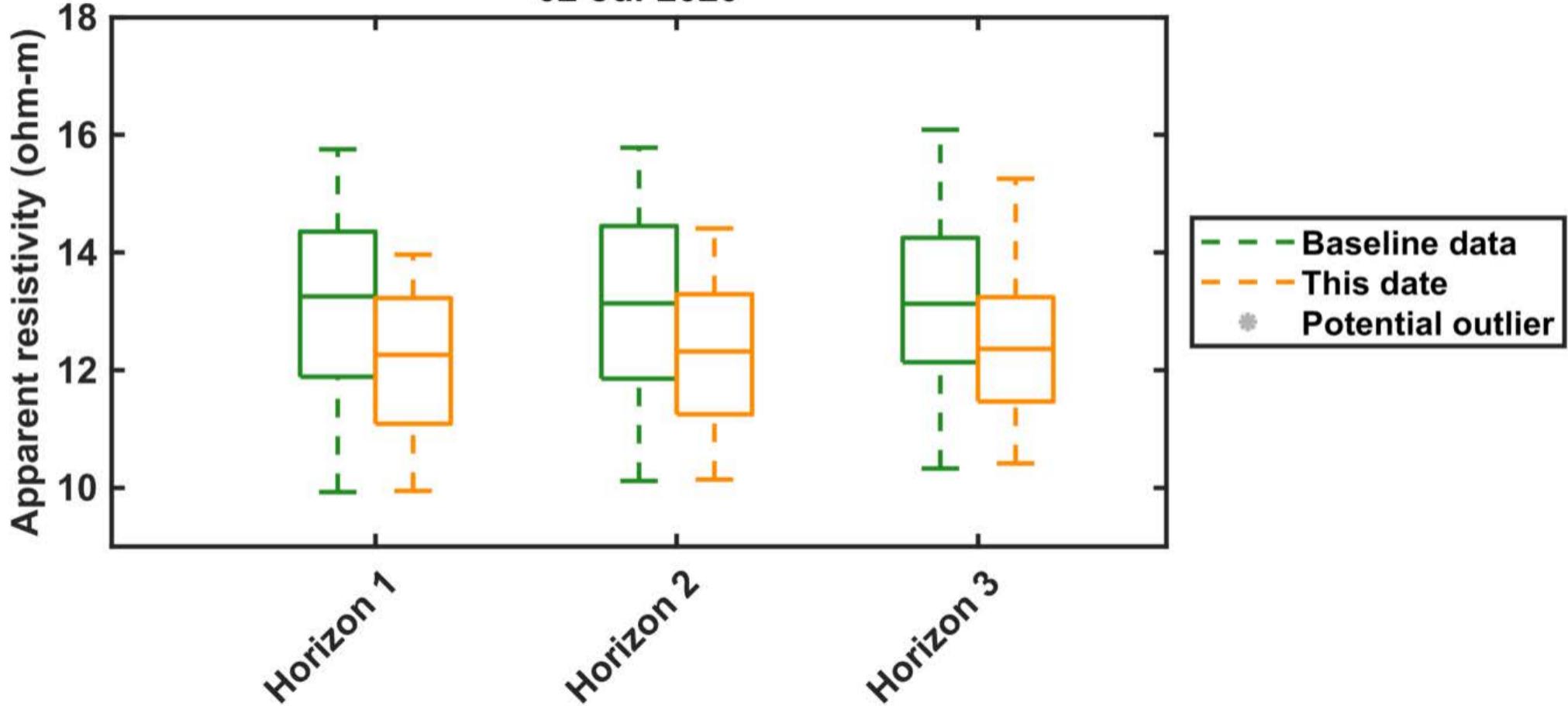


ATTACHMENT A

Box Diagrams for Third Quarter Monitoring Data

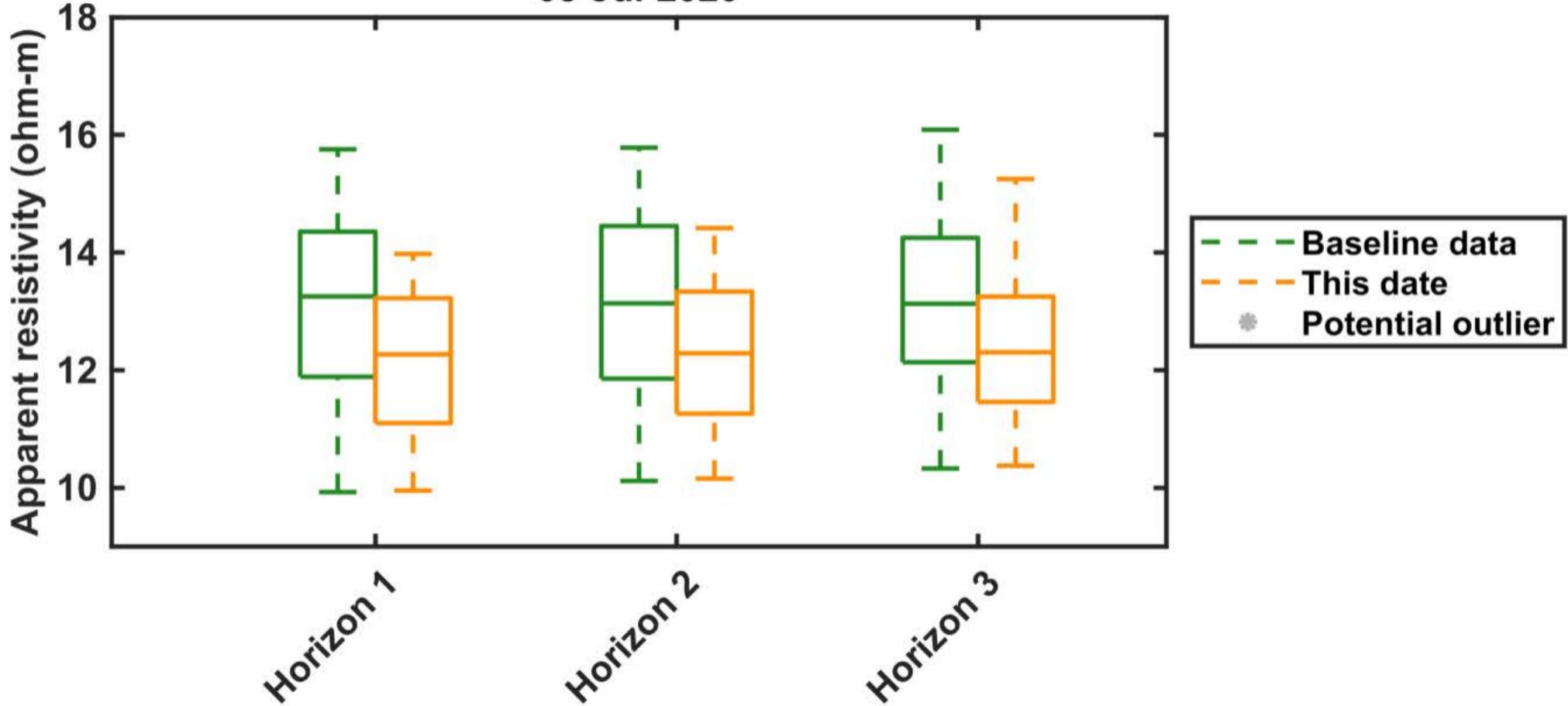
Florence electrical conductivity monitoring

02-Jul-2020



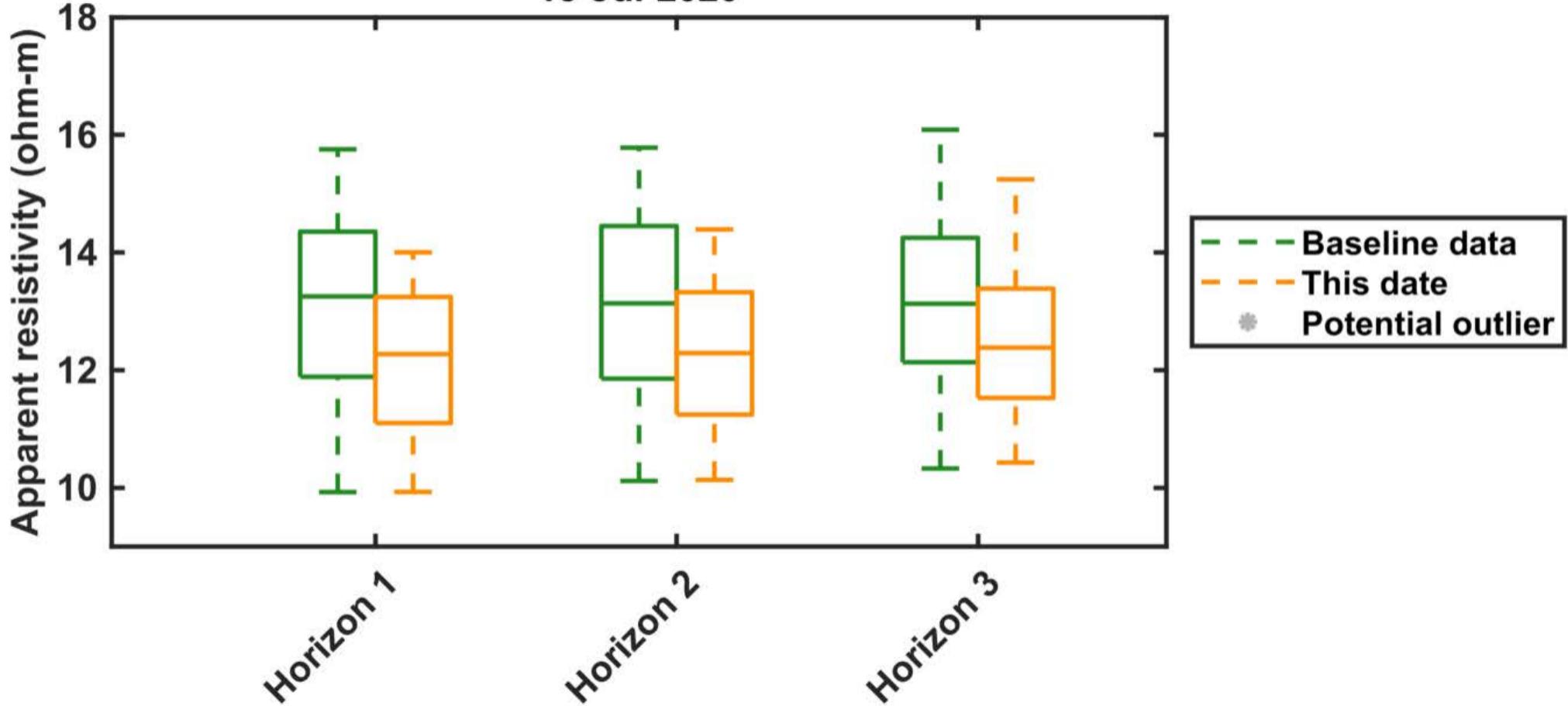
Florence electrical conductivity monitoring

08-Jul-2020



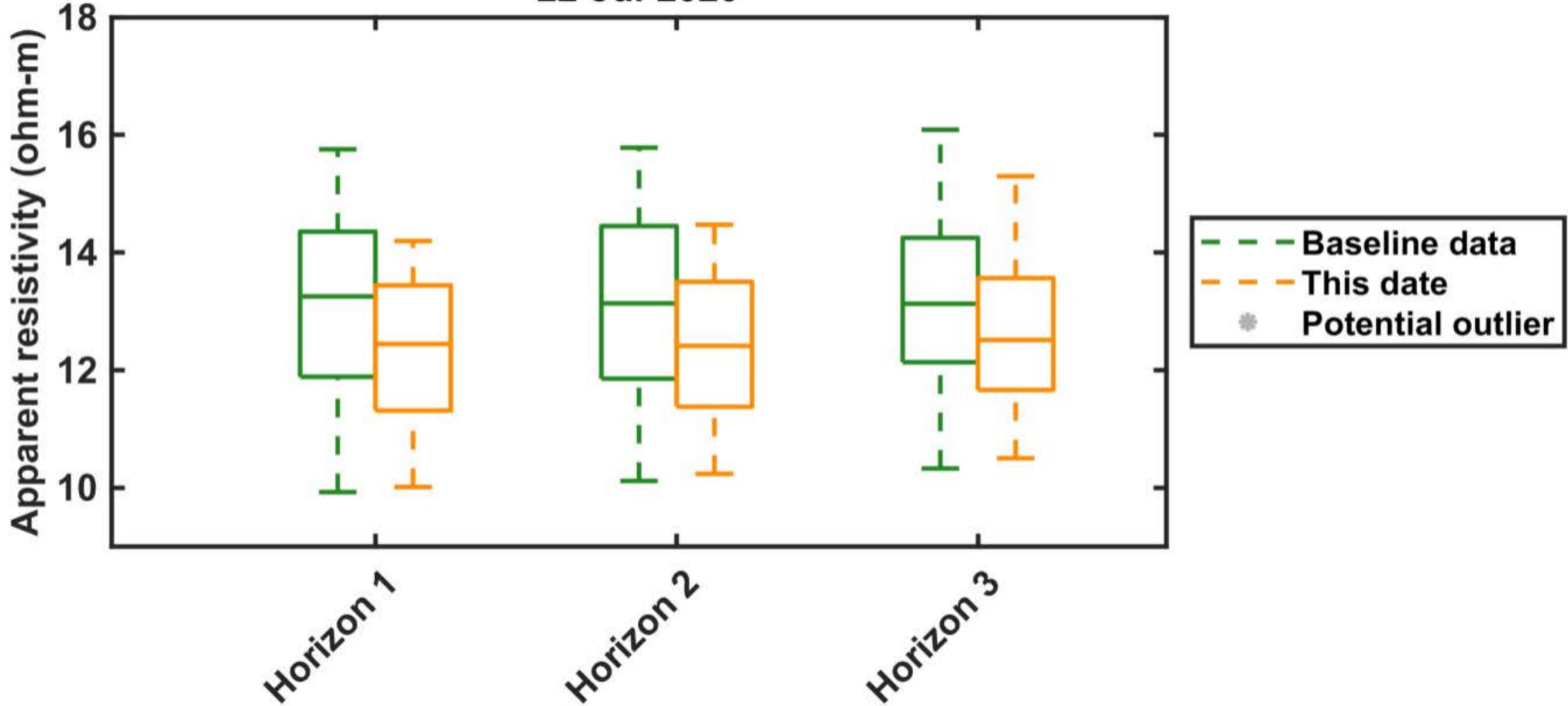
Florence electrical conductivity monitoring

15-Jul-2020



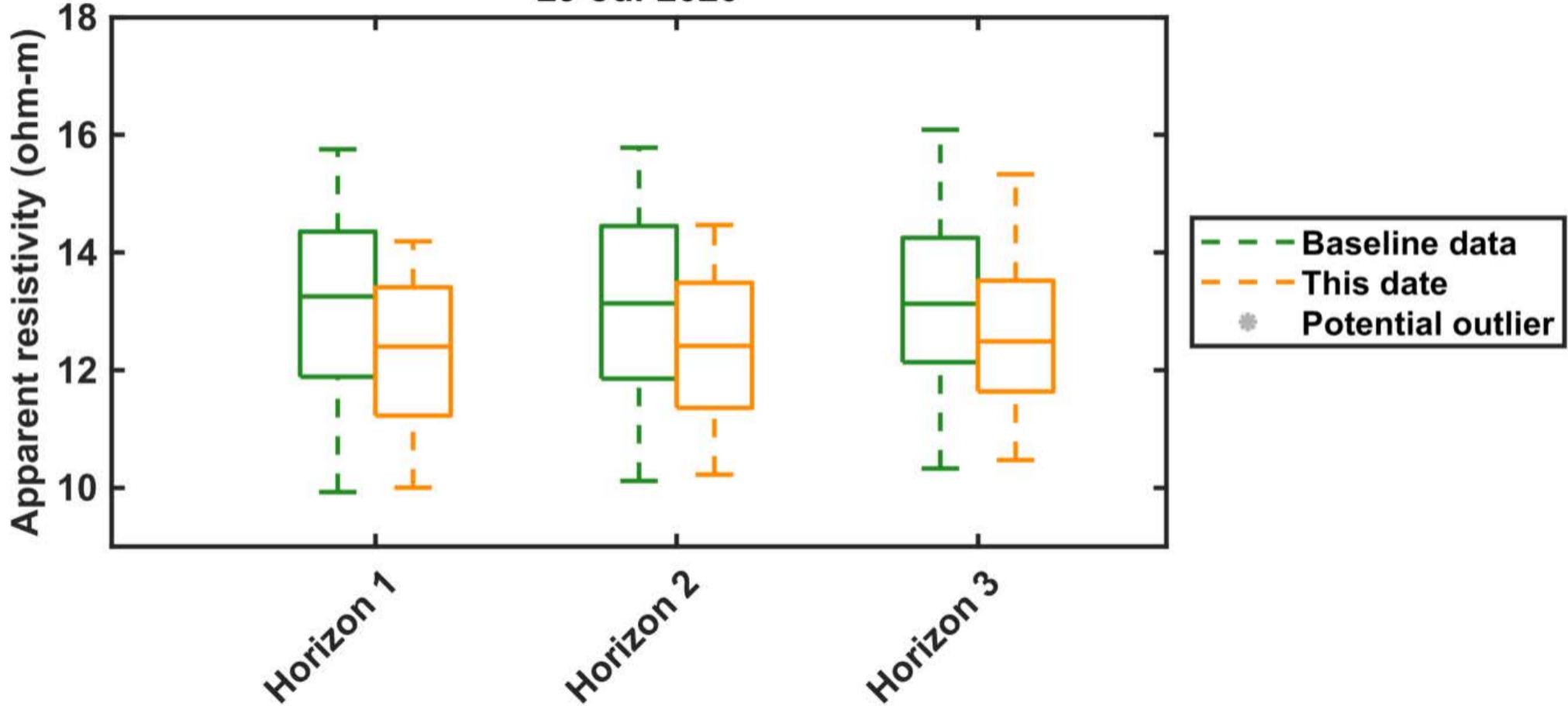
Florence electrical conductivity monitoring

22-Jul-2020



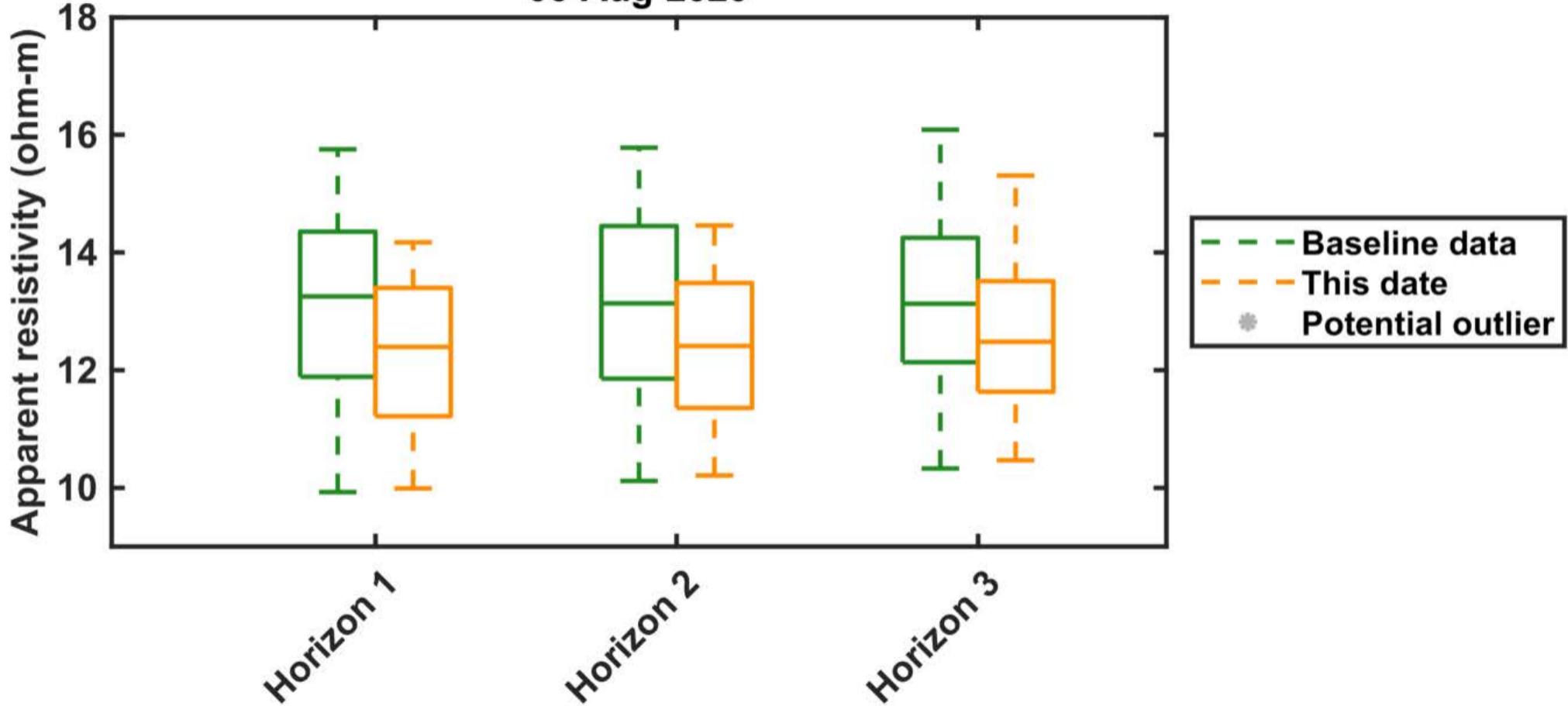
Florence electrical conductivity monitoring

29-Jul-2020



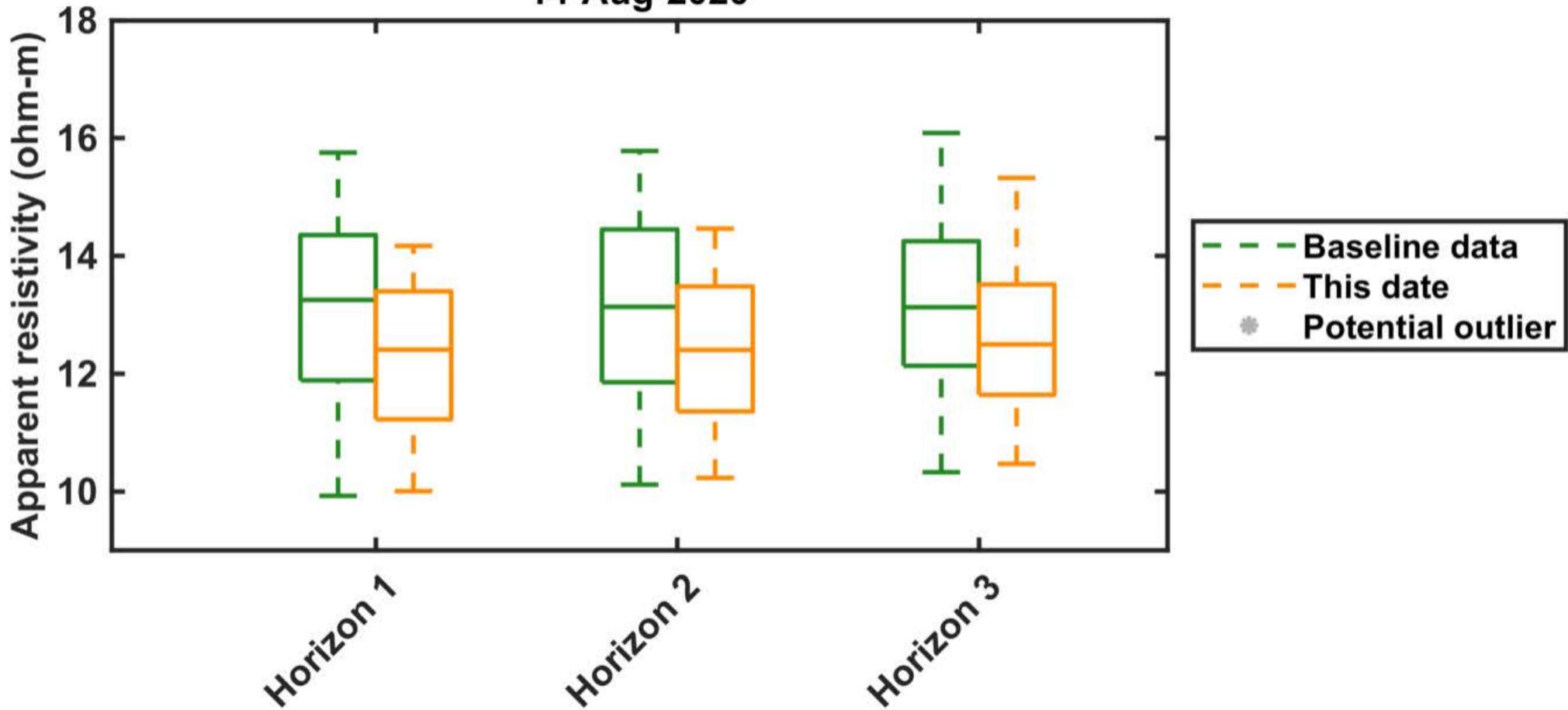
Florence electrical conductivity monitoring

06-Aug-2020



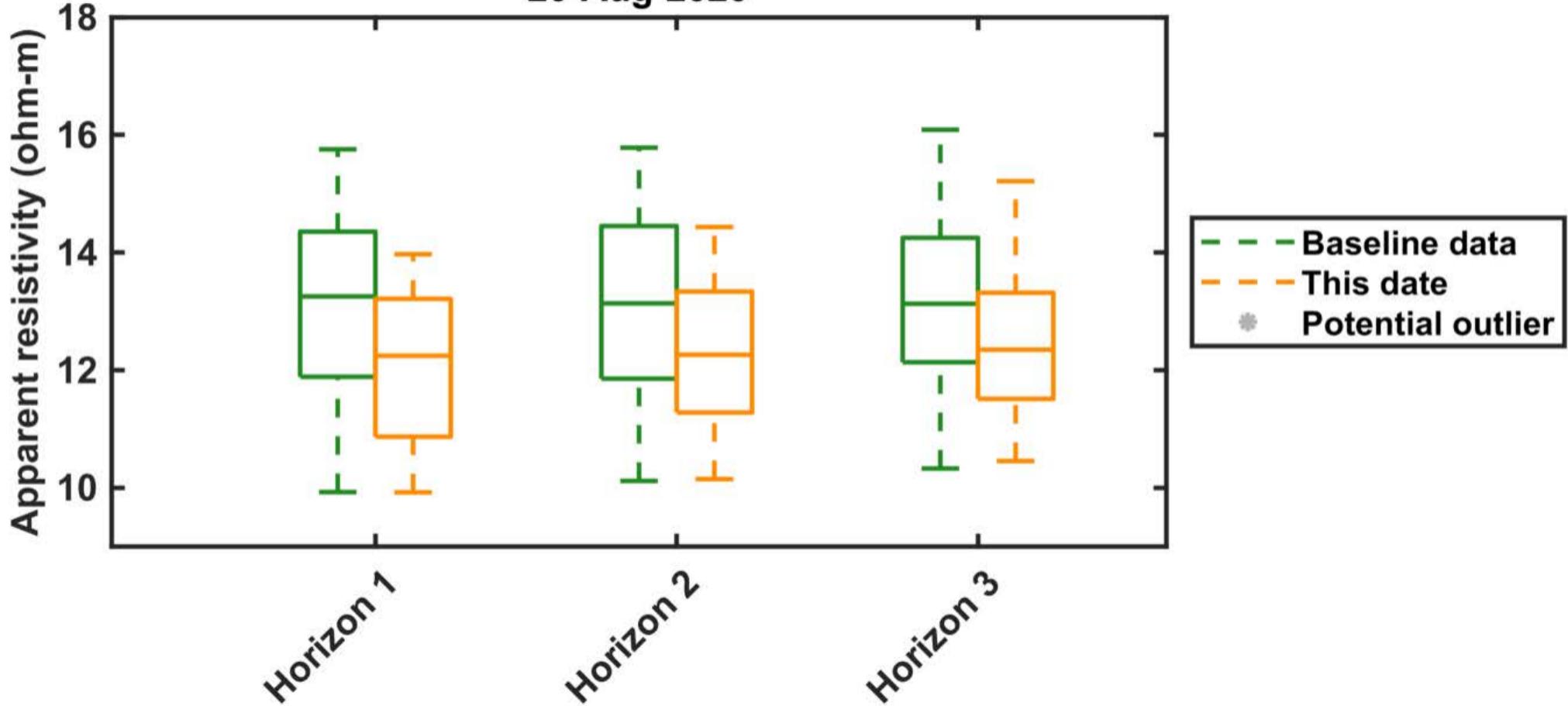
Florence electrical conductivity monitoring

14-Aug-2020



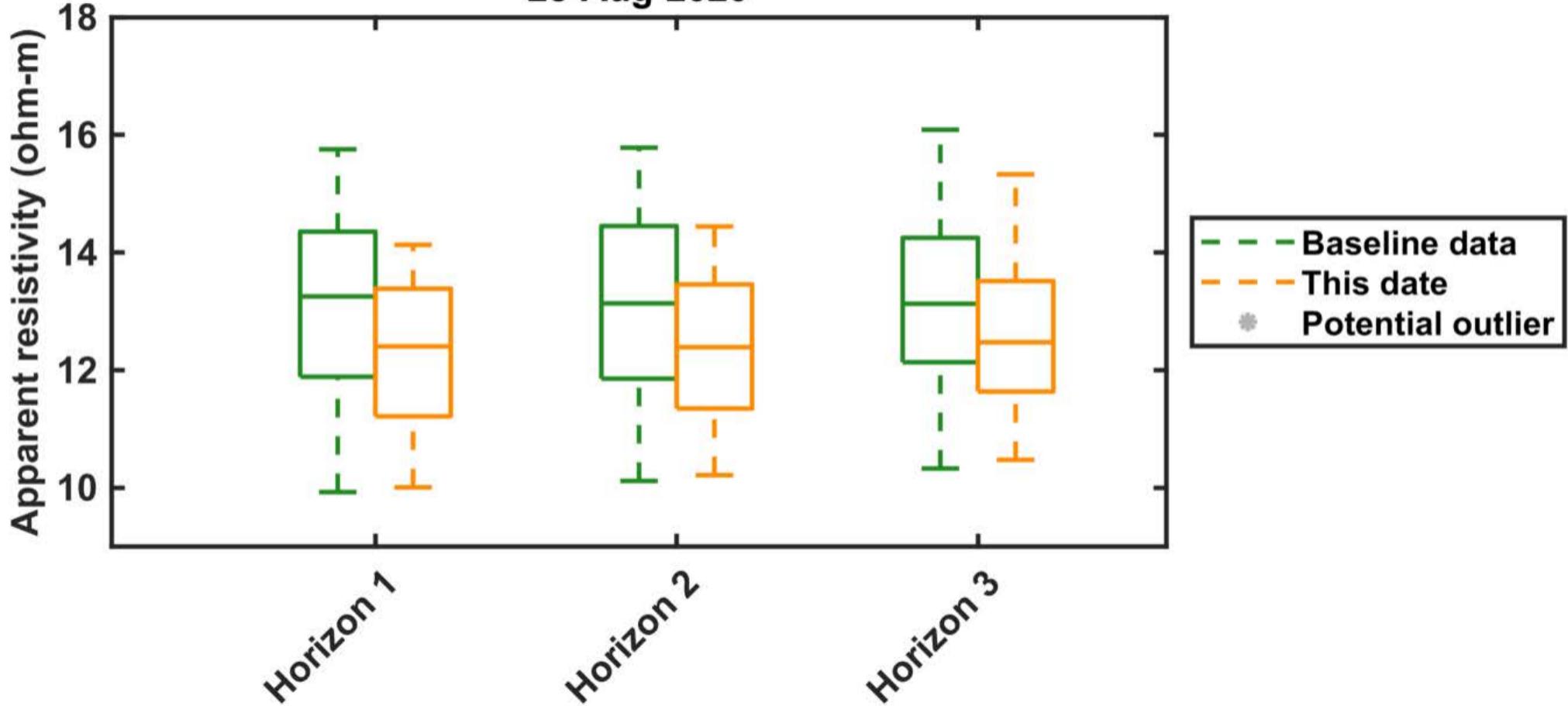
Florence electrical conductivity monitoring

20-Aug-2020



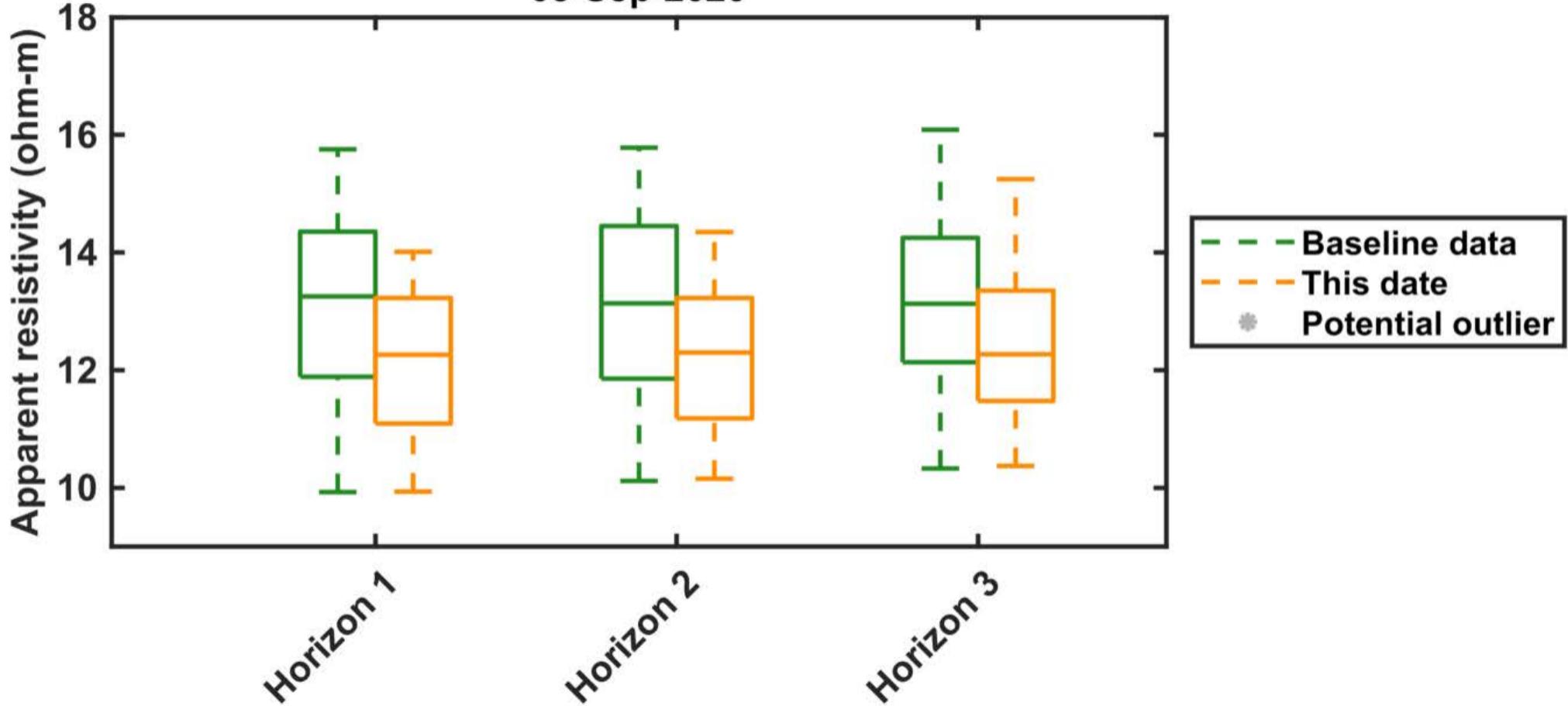
Florence electrical conductivity monitoring

28-Aug-2020



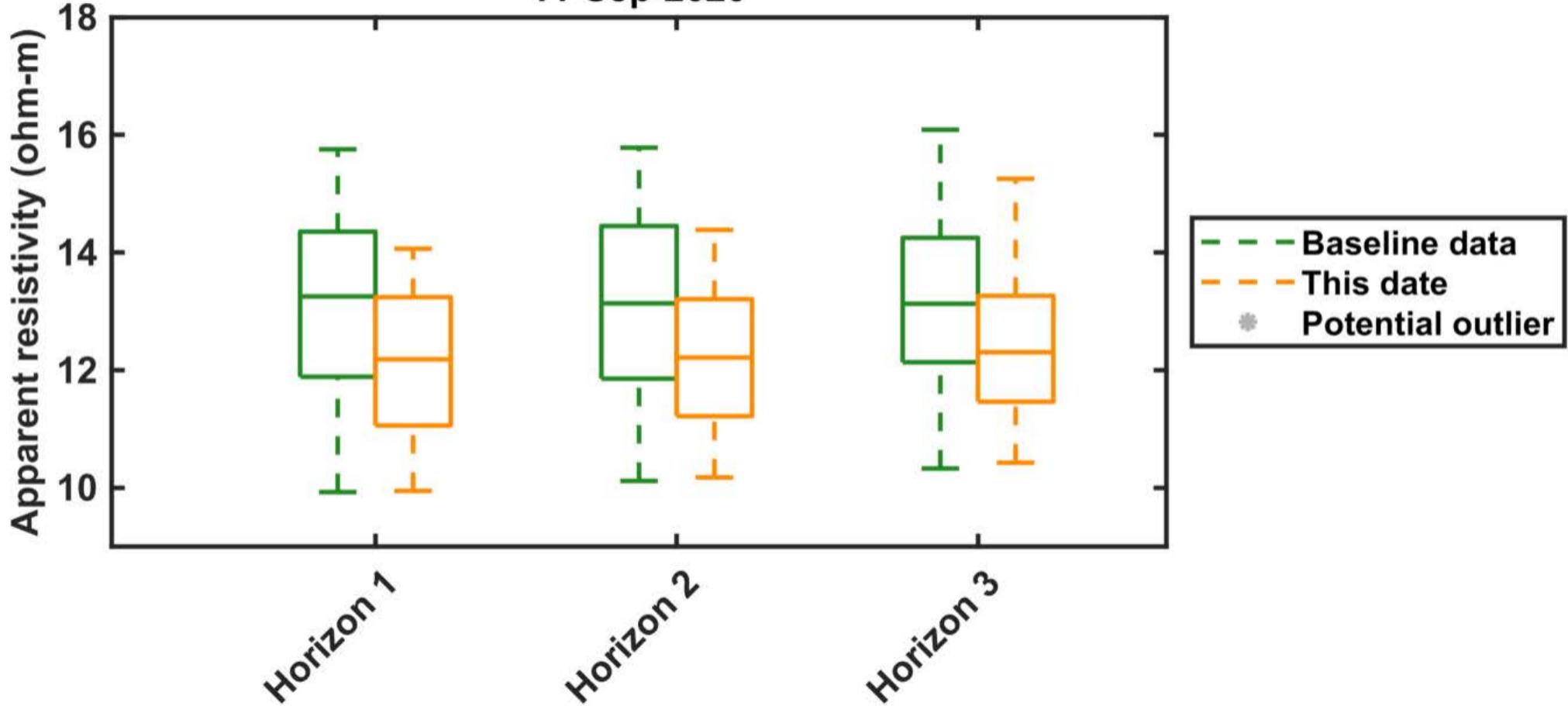
Florence electrical conductivity monitoring

03-Sep-2020



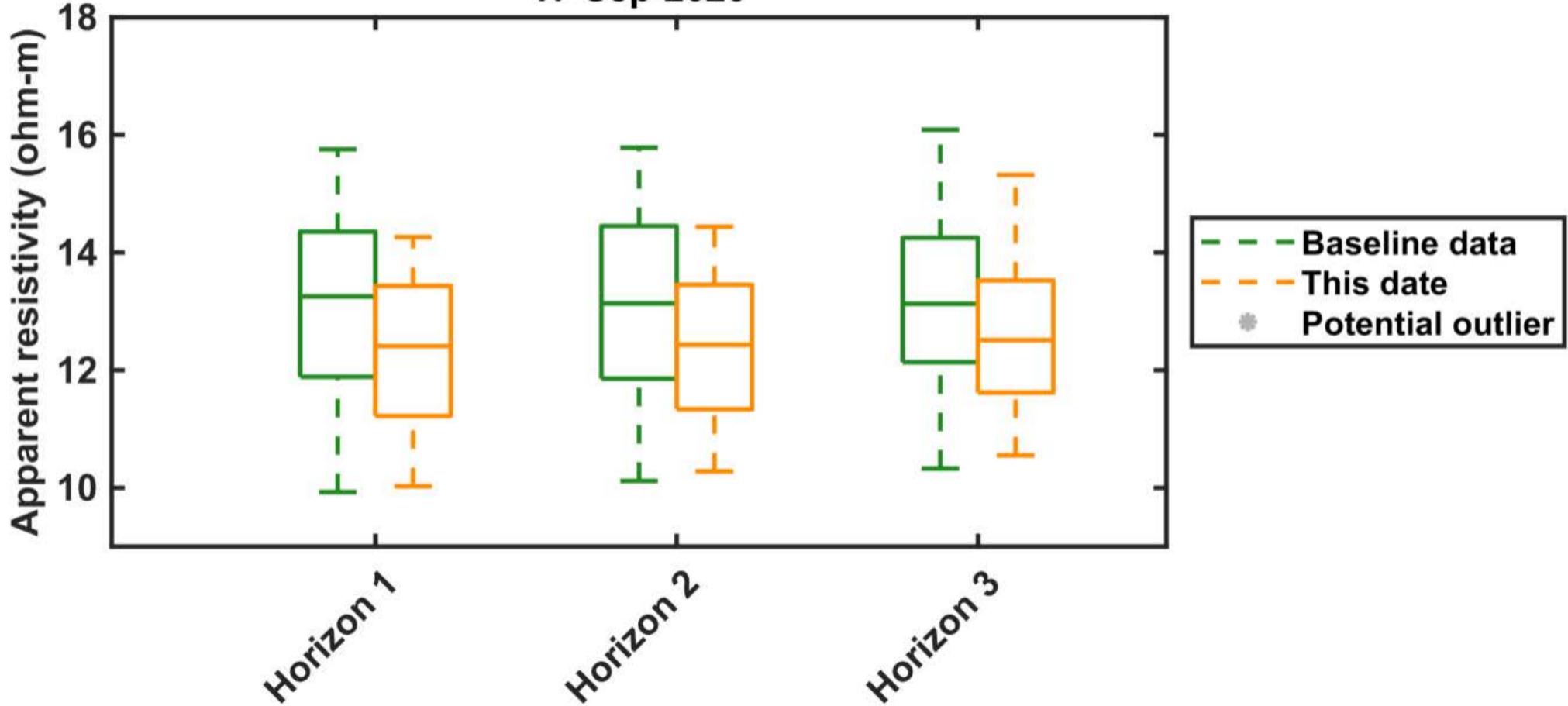
Florence electrical conductivity monitoring

11-Sep-2020



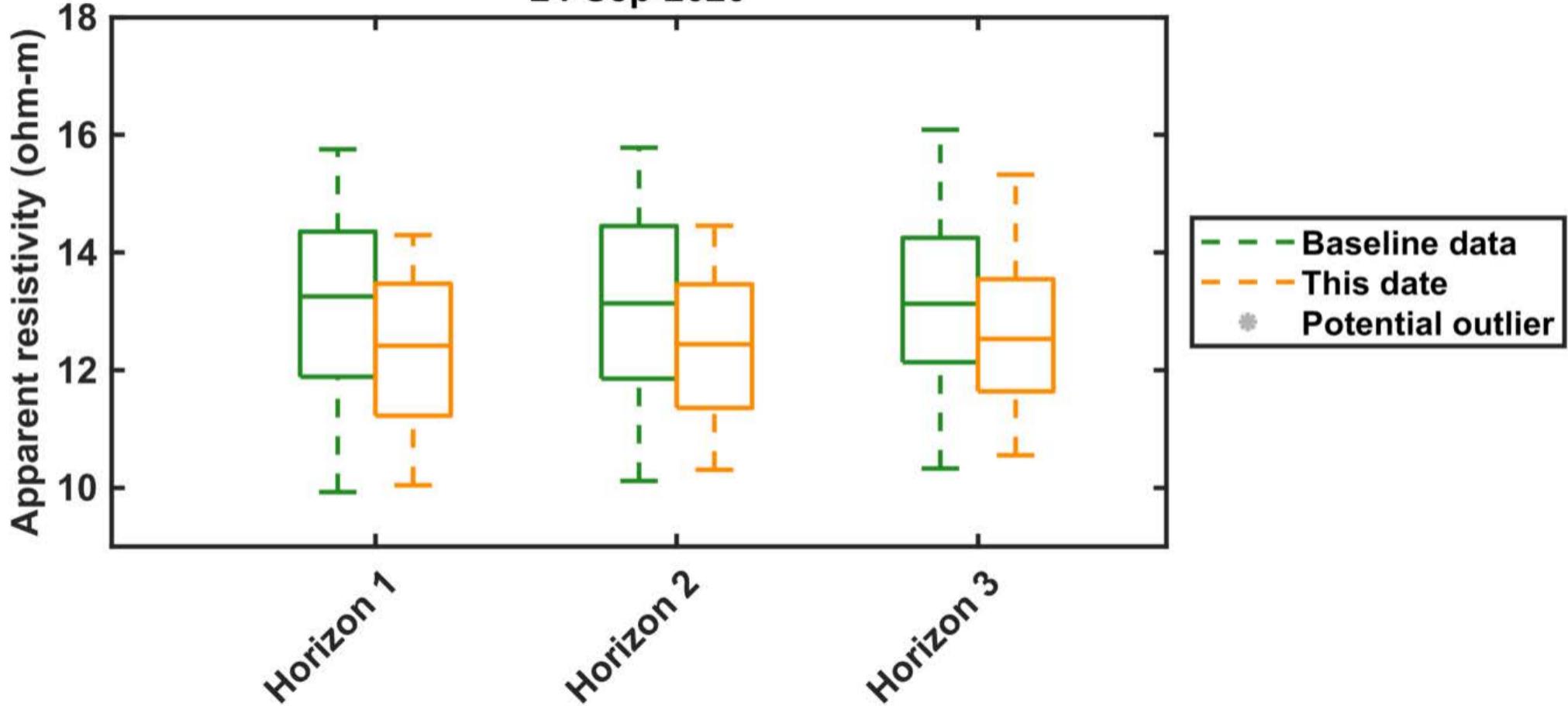
Florence electrical conductivity monitoring

17-Sep-2020



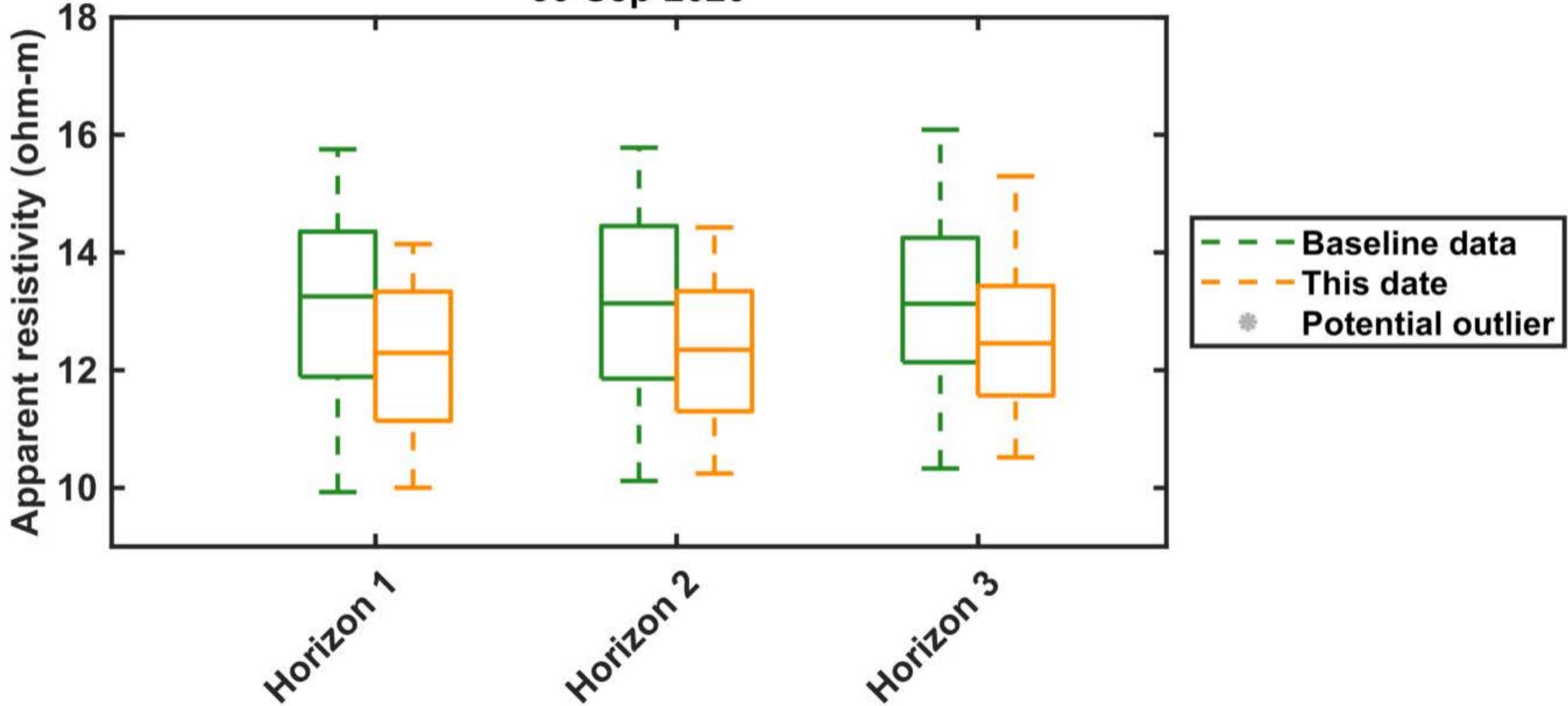
Florence electrical conductivity monitoring

24-Sep-2020



Florence electrical conductivity monitoring

30-Sep-2020

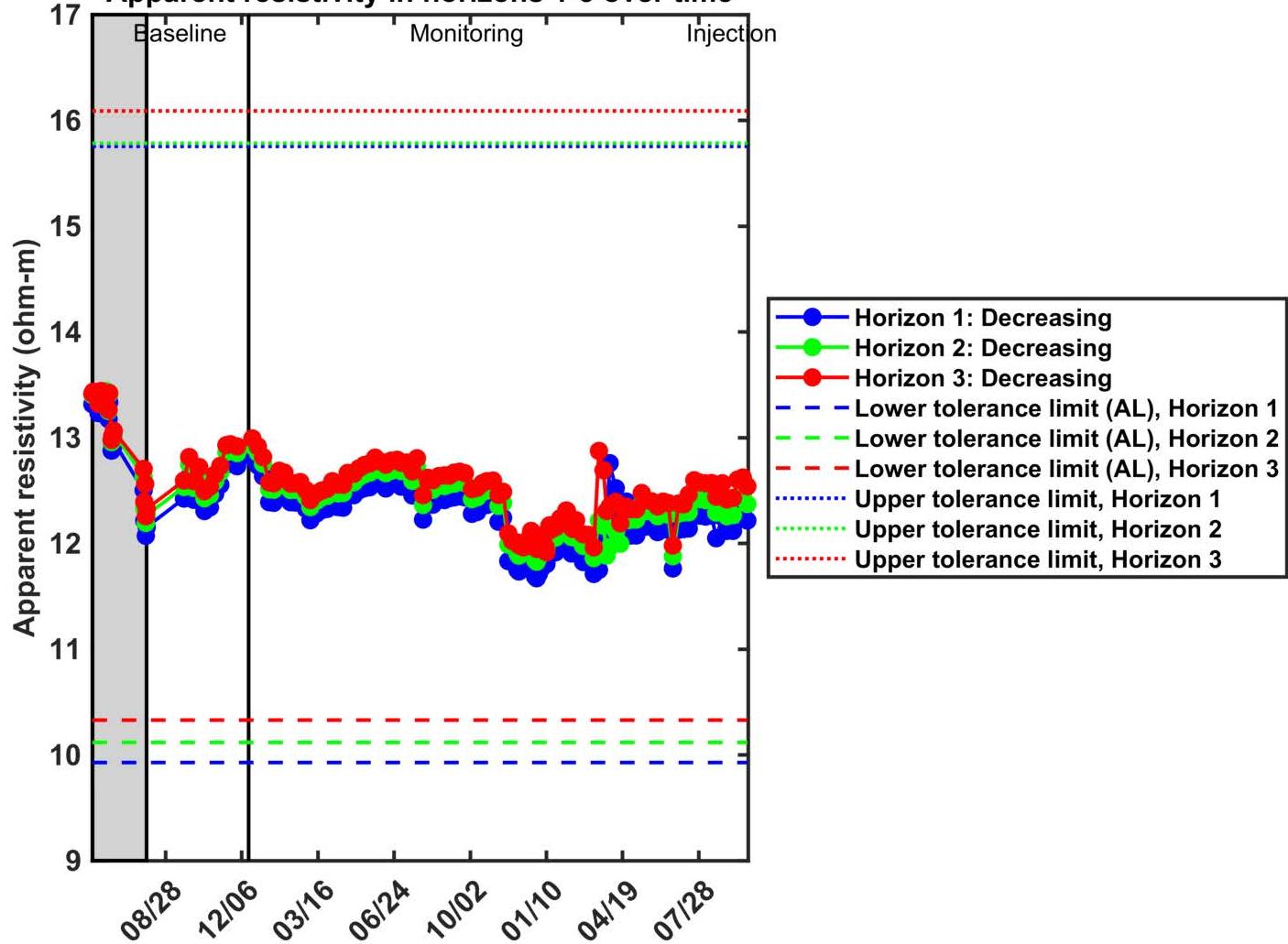


ATTACHMENT B

Summary Plot of Bulk Electrical Conductivity

Florence ambient electrical conductivity monitoring

Apparent resistivity in horizons 1-3 over time



ATTACHMENT 6

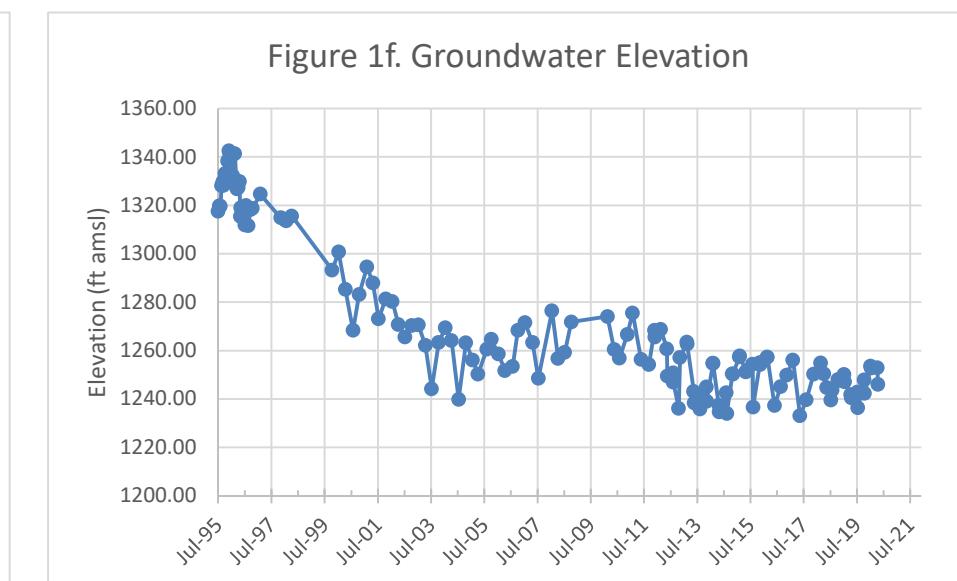
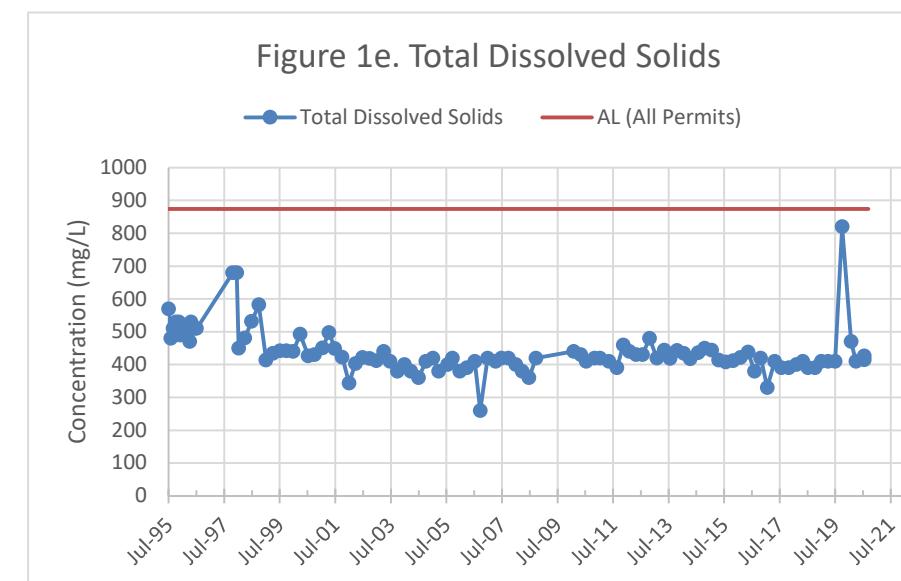
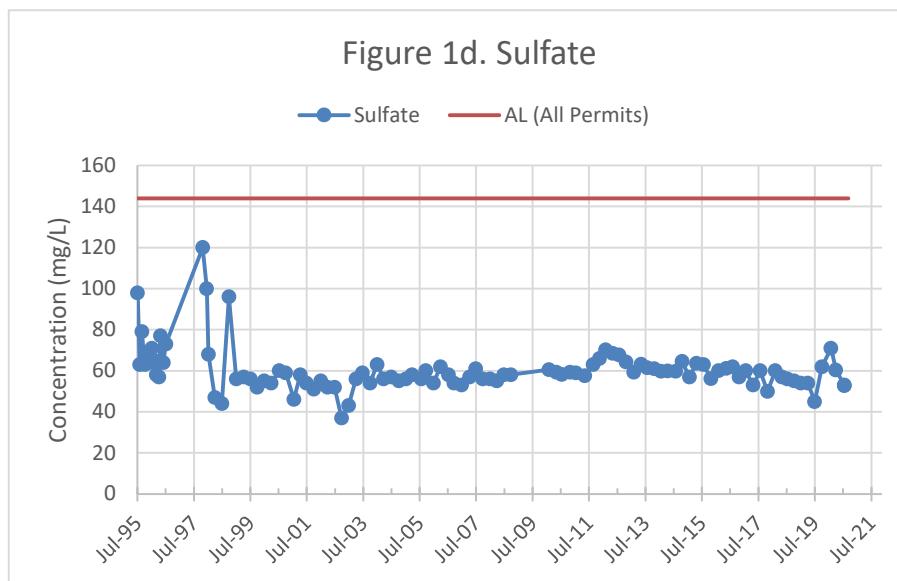
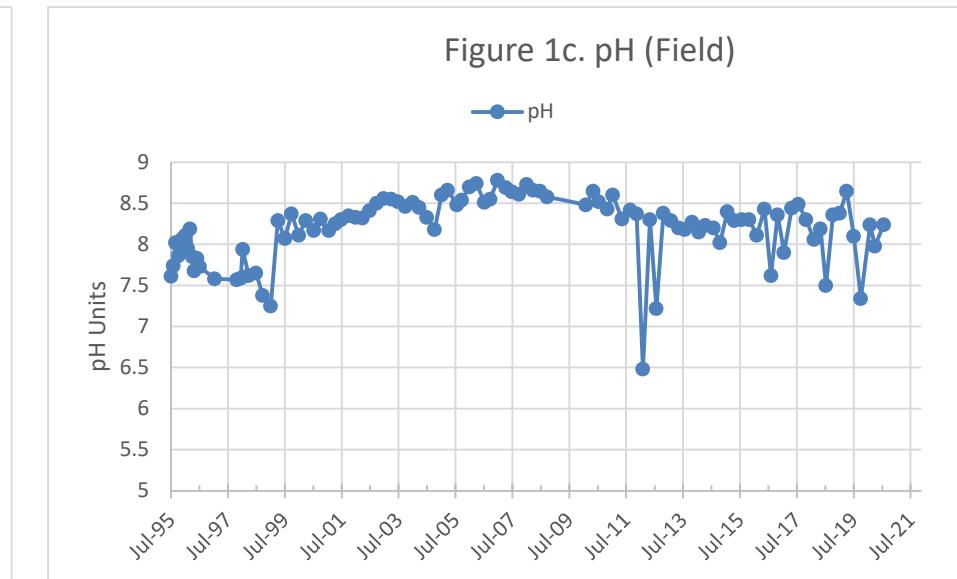
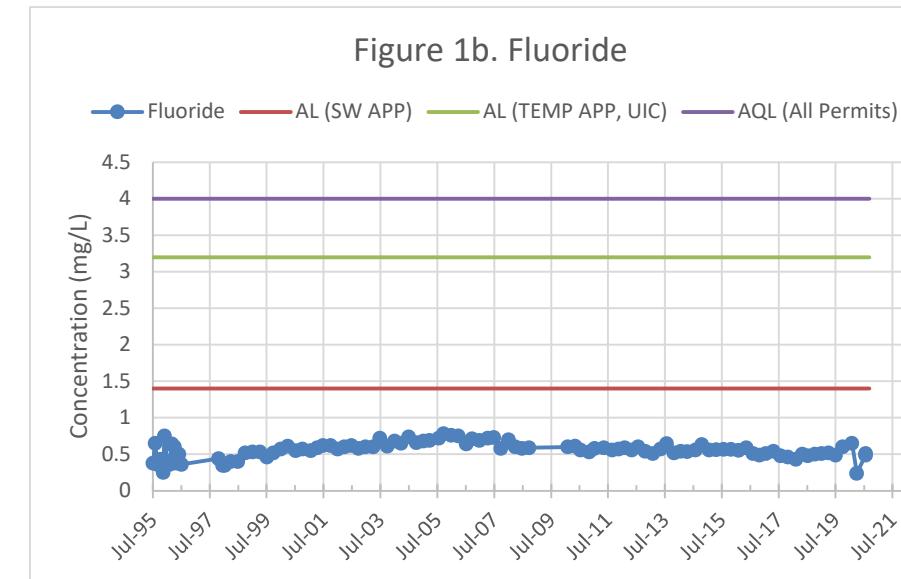
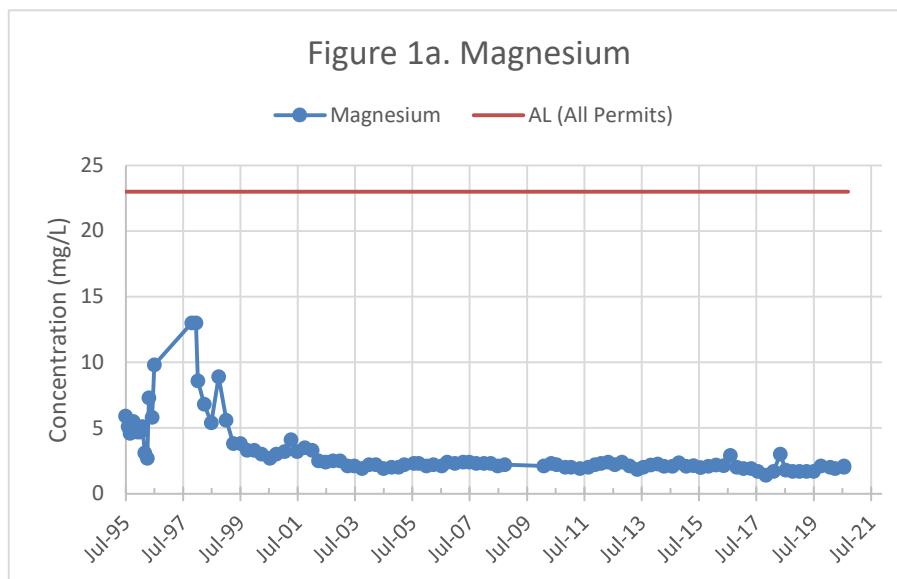
Table and Graphs of Monitor Well Water Levels and Analytical Results

- 6A. Quarterly Concentration Graphs**
- 6B. Well Details and Water Level Elevations**
- 6C. Groundwater Monitoring Summary**

ATTACHMENT 6A

Quarterly Concentration Graphs

M14-GL QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

All Permits = SW APP, Temp APP, and UIC

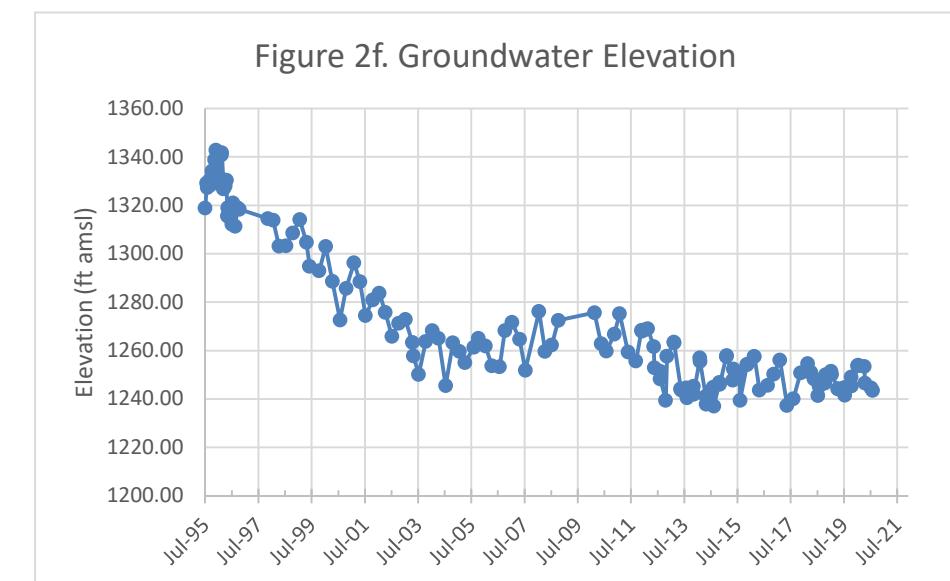
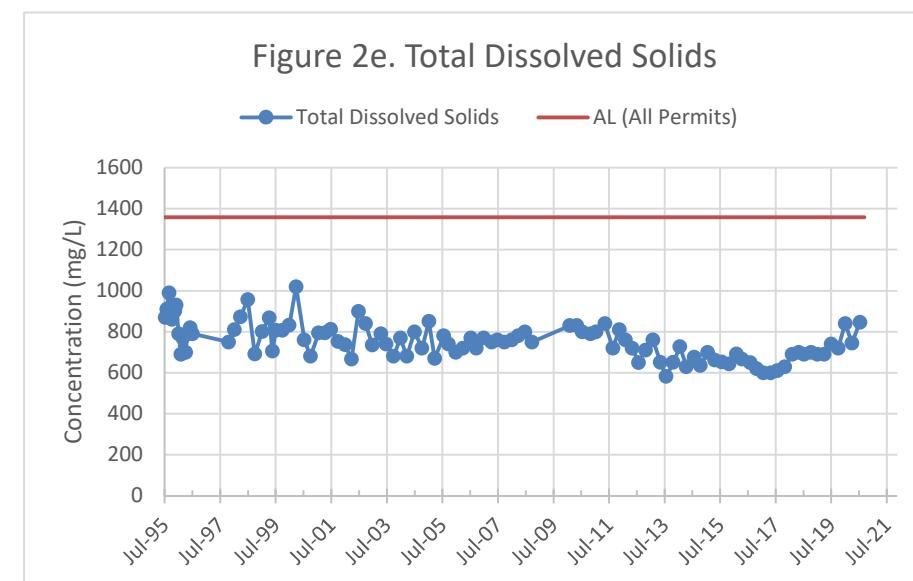
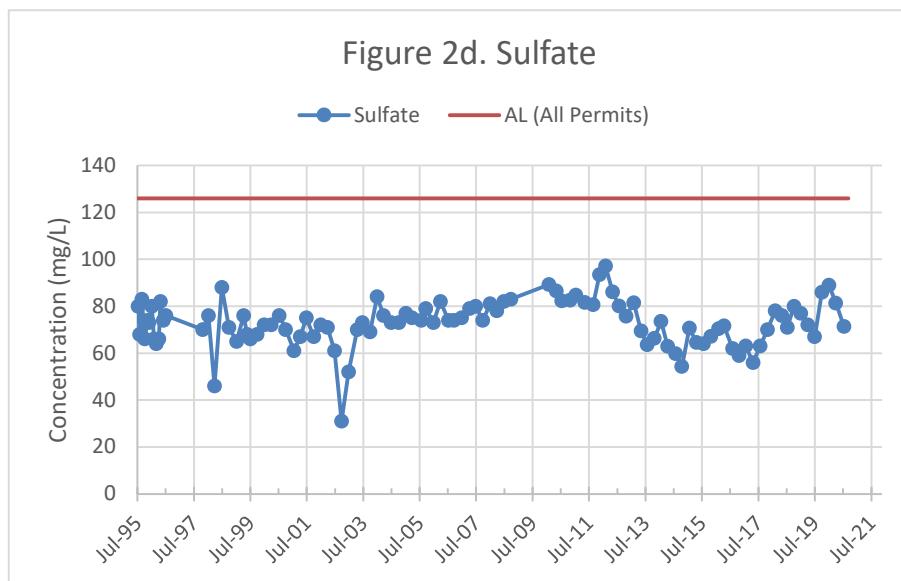
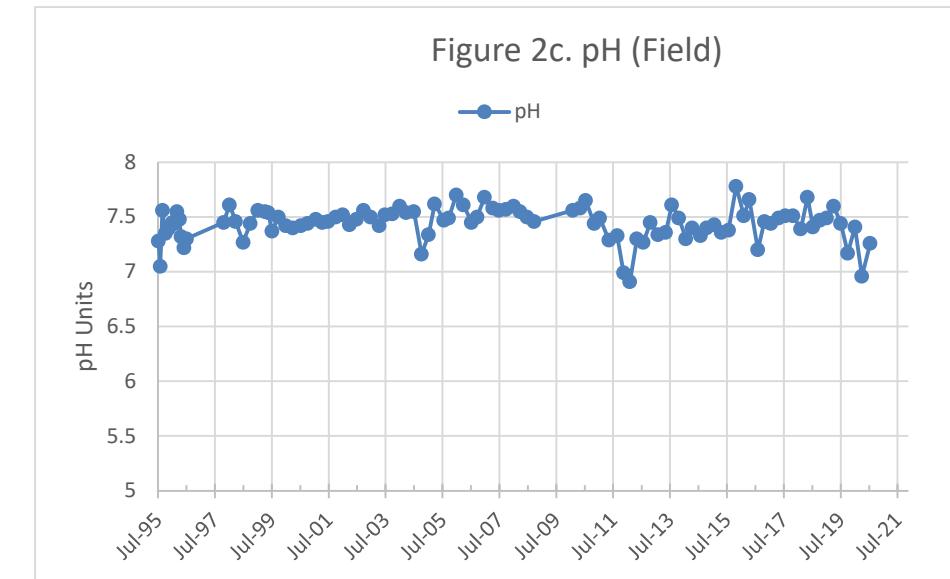
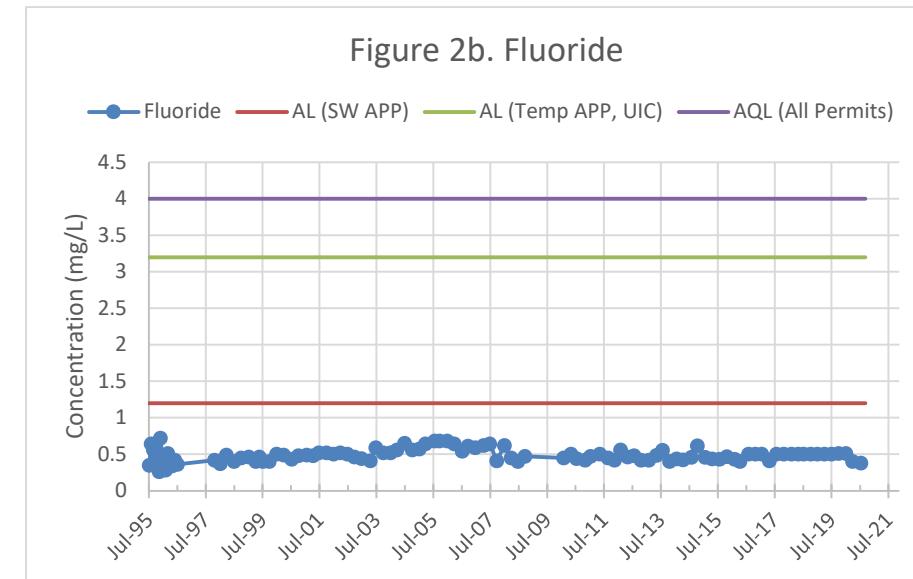
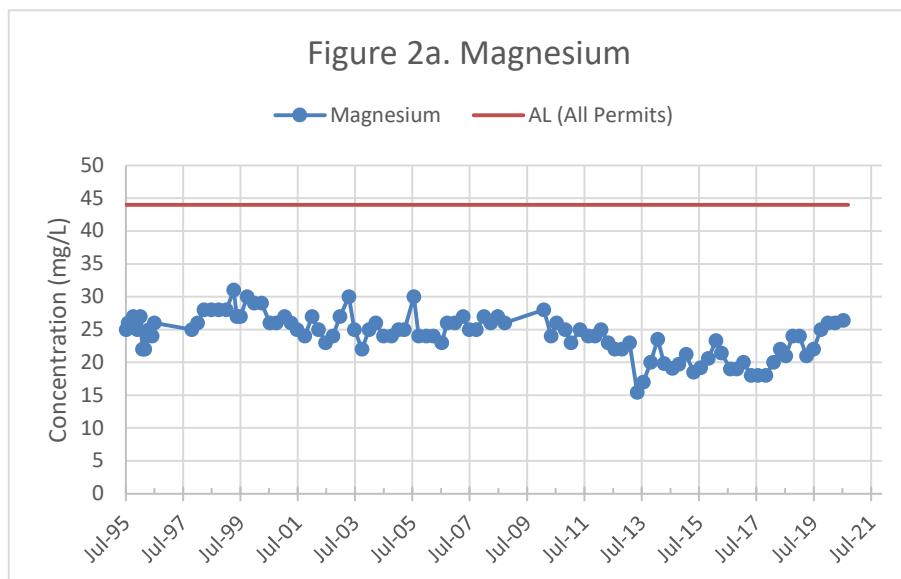
SW APP = Sitewide APP No. P-101704

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M15-GU QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

All Permits = SW APP, Temp APP, and UIC

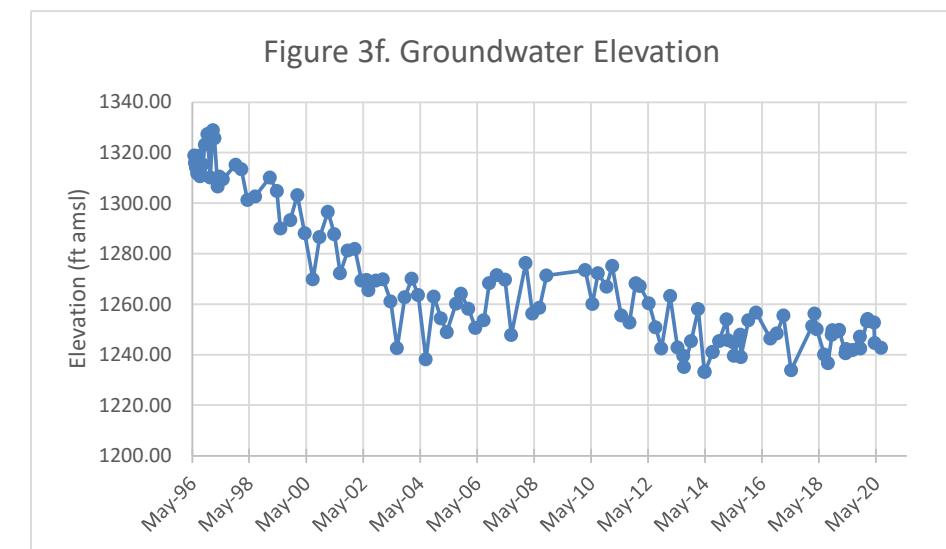
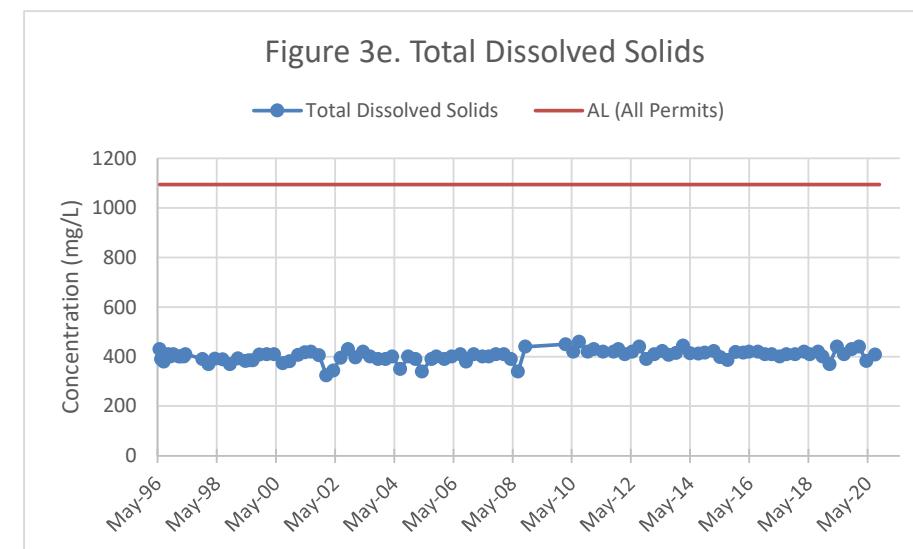
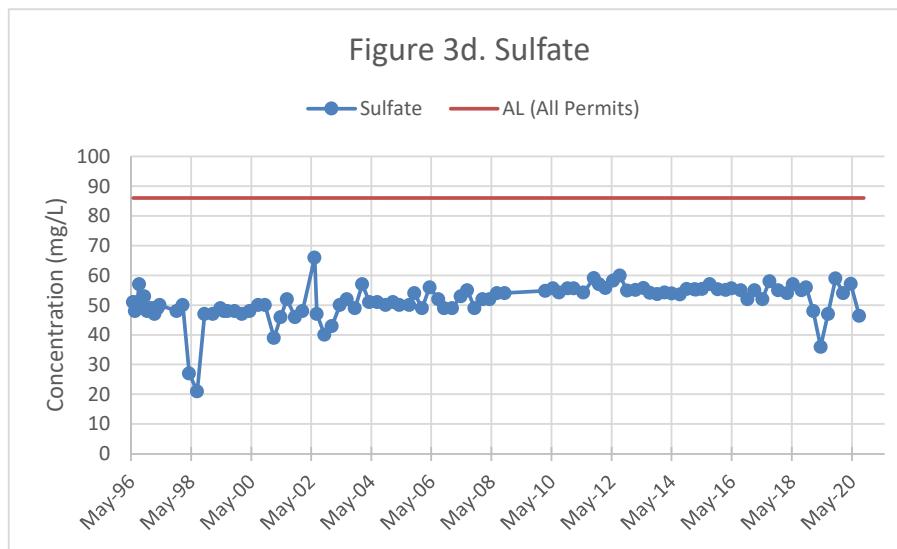
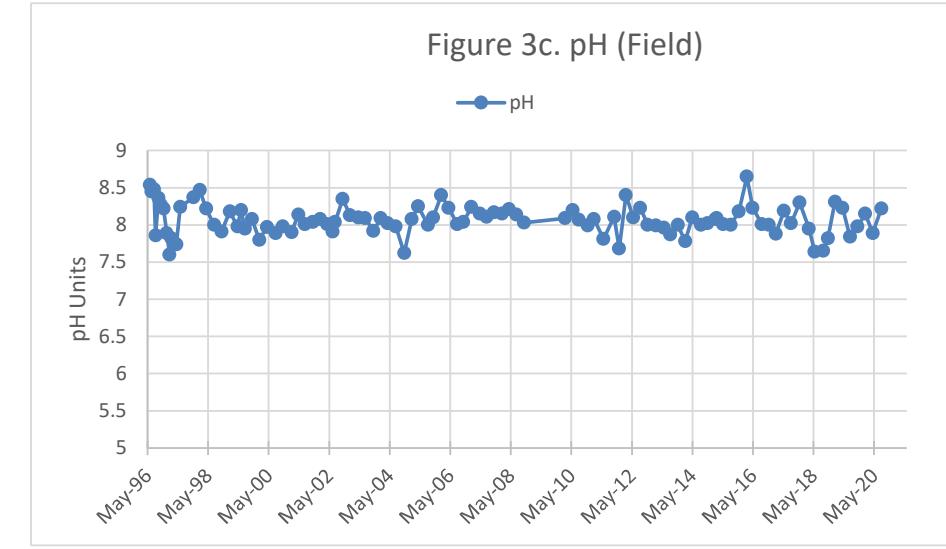
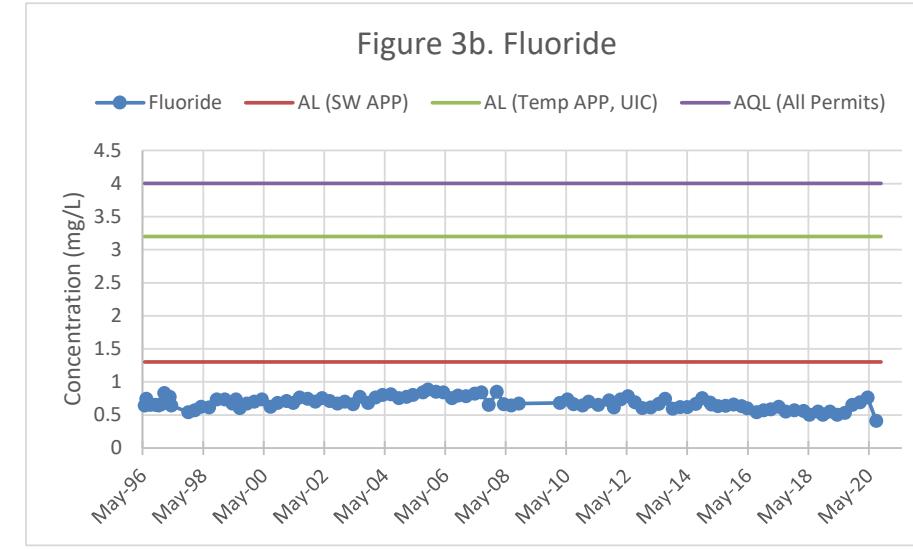
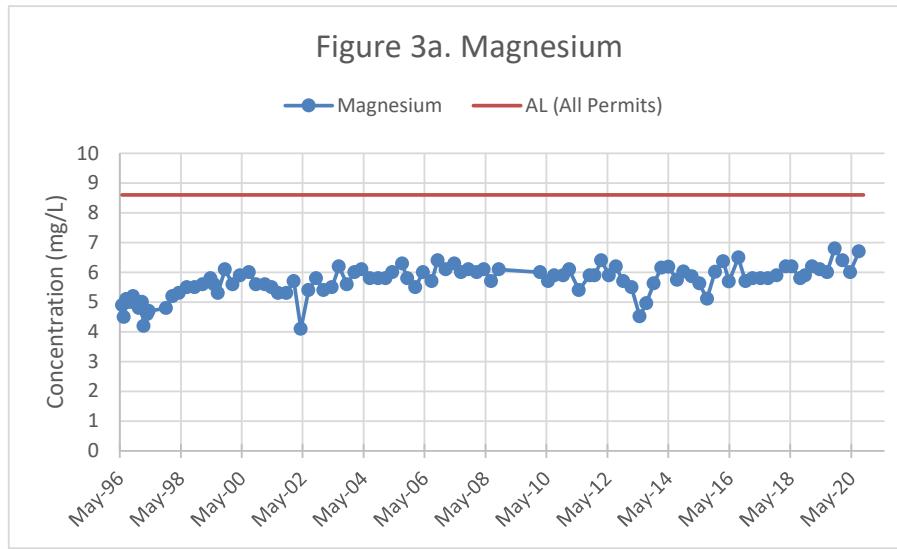
SW APP = Sitewide APP No. P-101704

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M22-O QUARTERLY CONCENTRATION GRAPHS



Notes:

Historical outliers removed from graphs for visual representation, but are maintained in the dataset.

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

All Permits = SW APP, Temp APP, and UIC

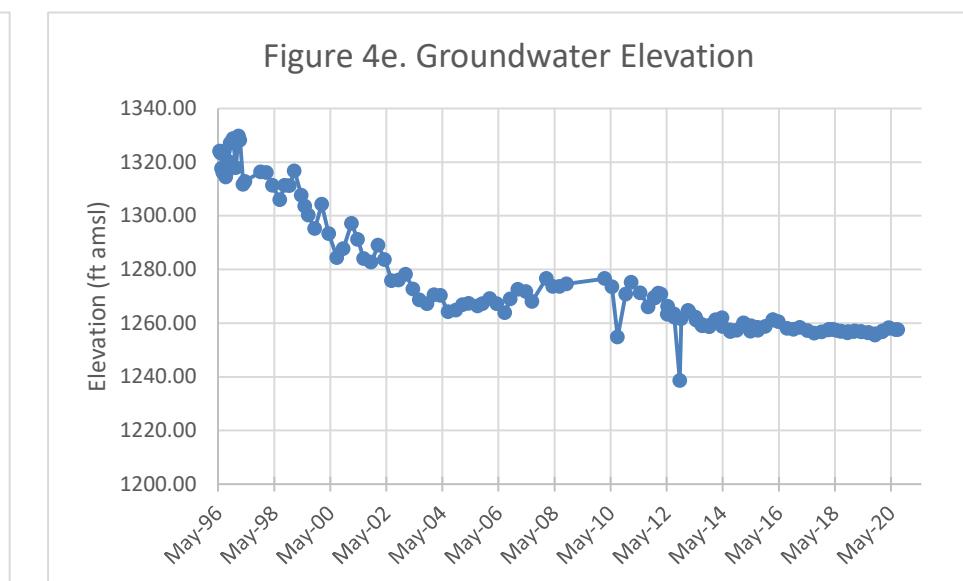
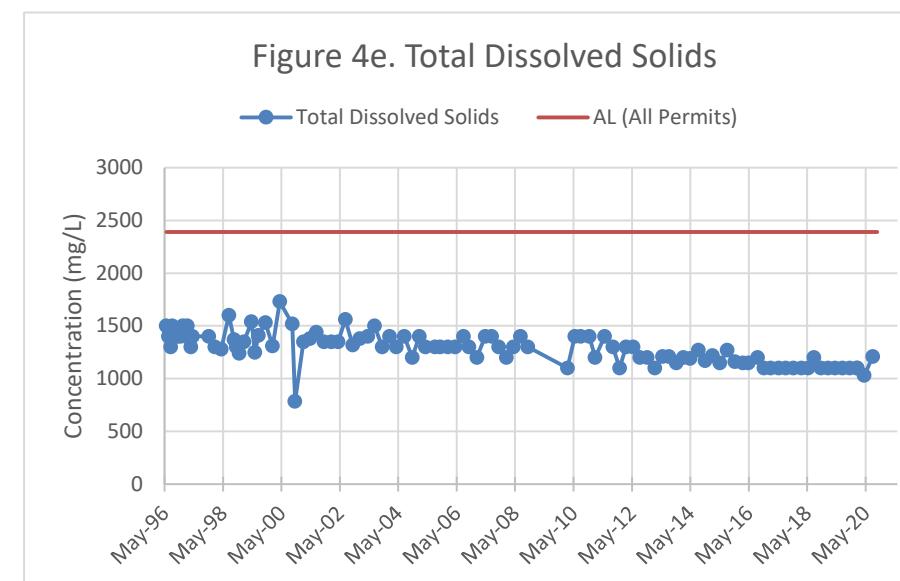
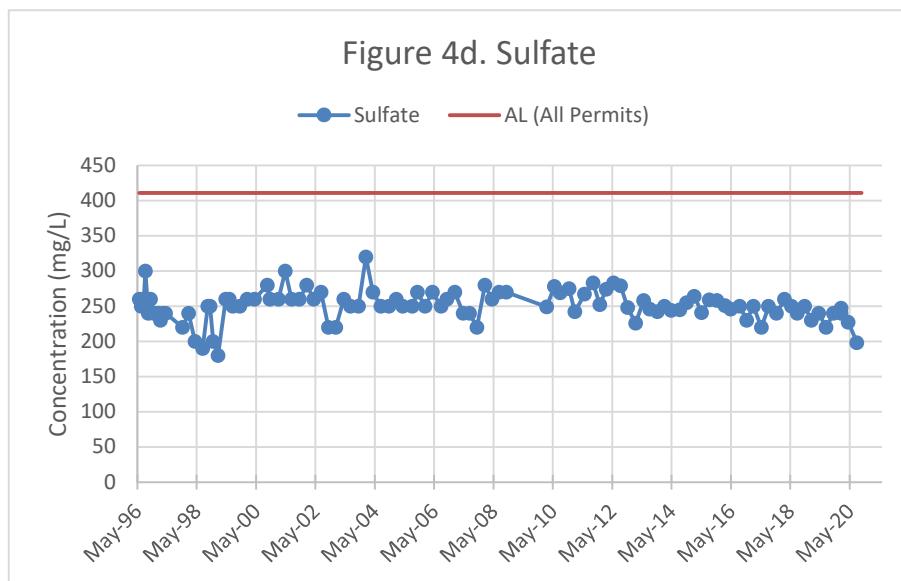
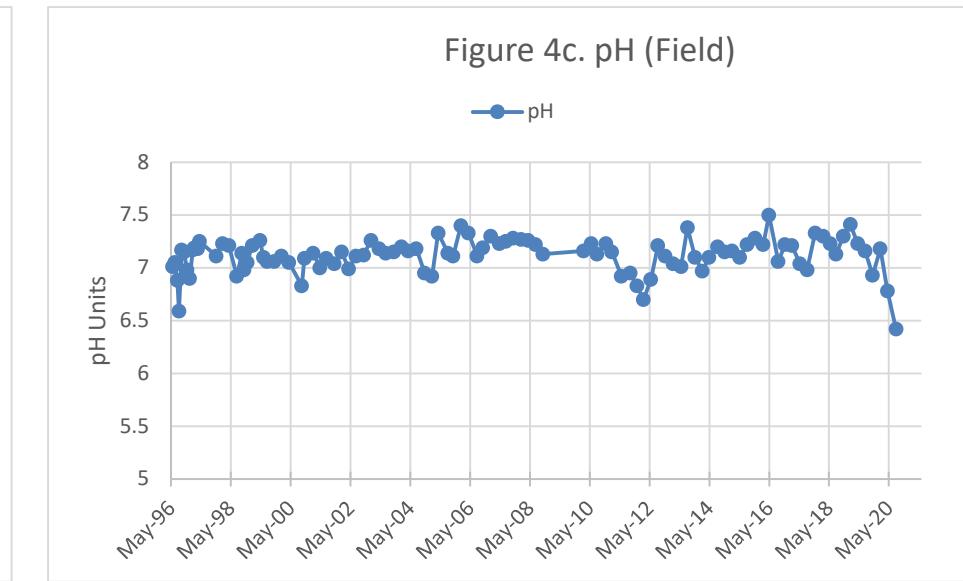
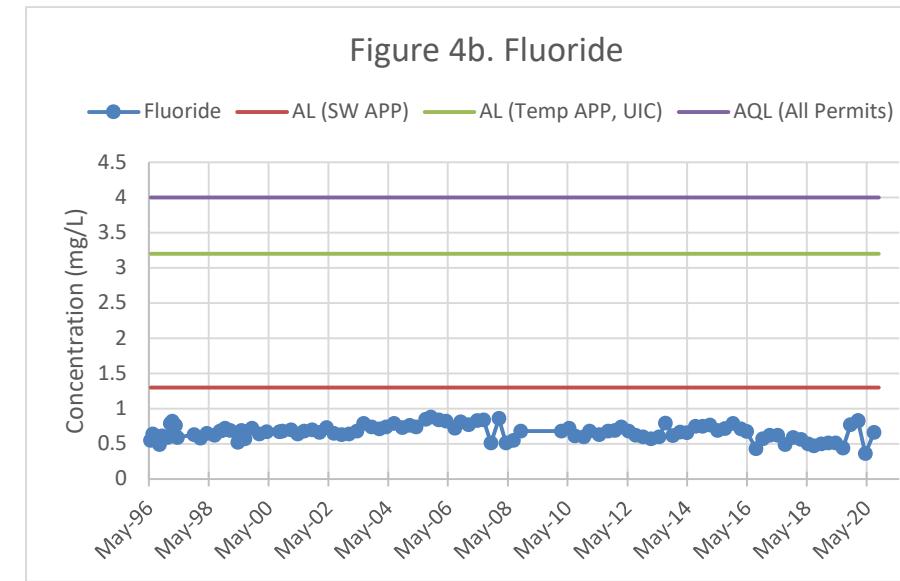
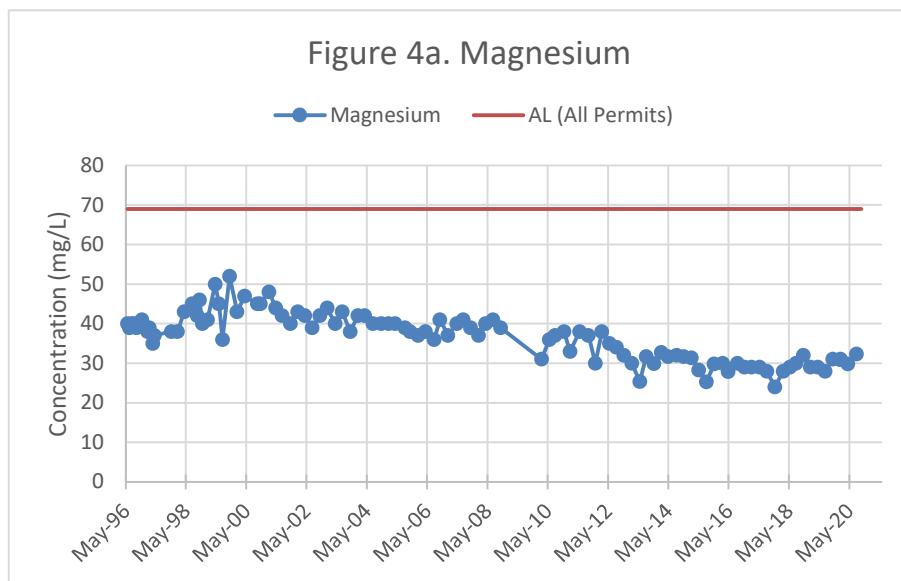
SW APP = Sitewide APP No. P-101704

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M23-UBF QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

All Permits = SW APP, Temp APP, and UIC

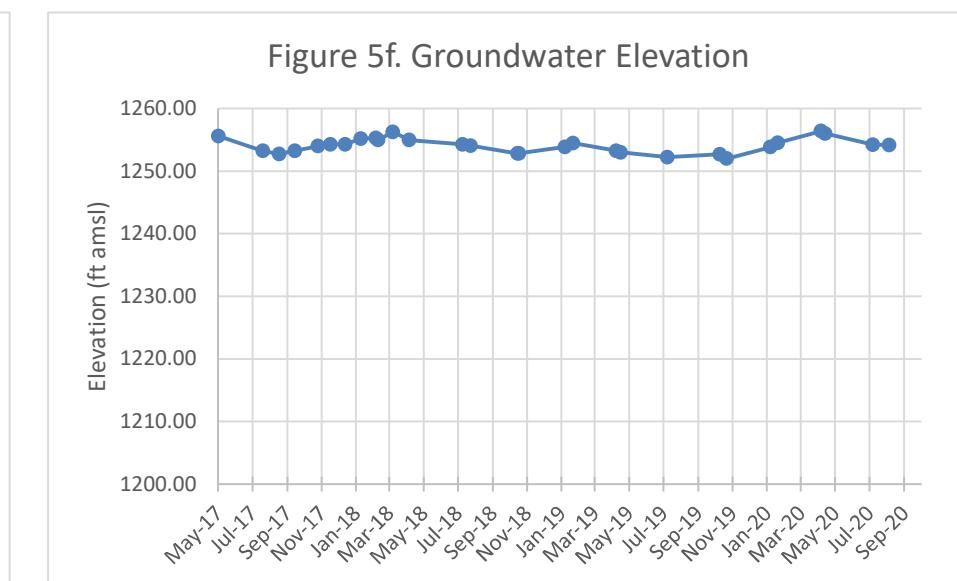
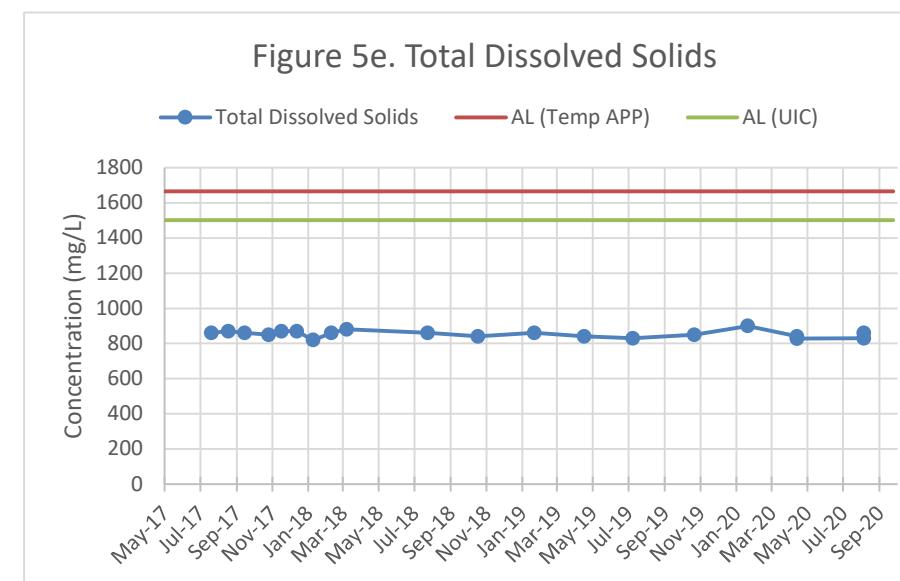
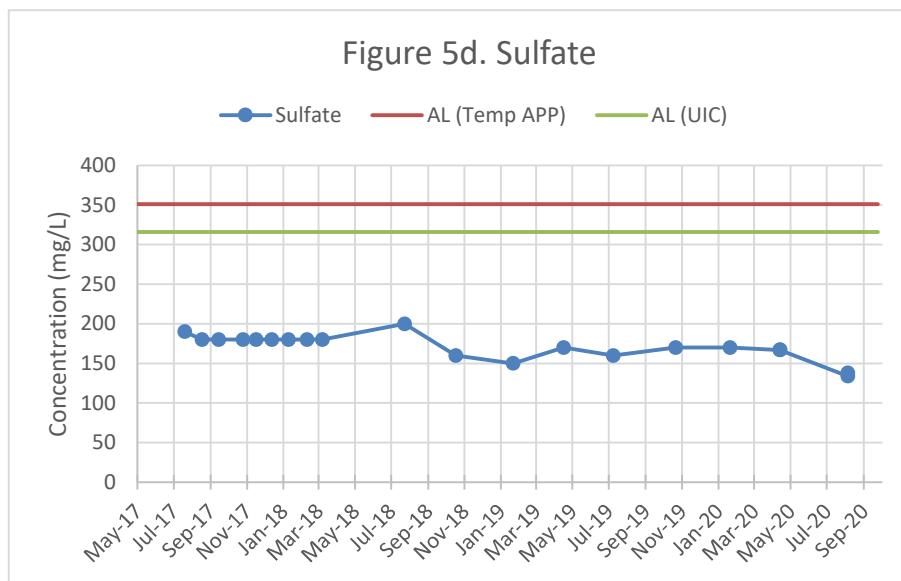
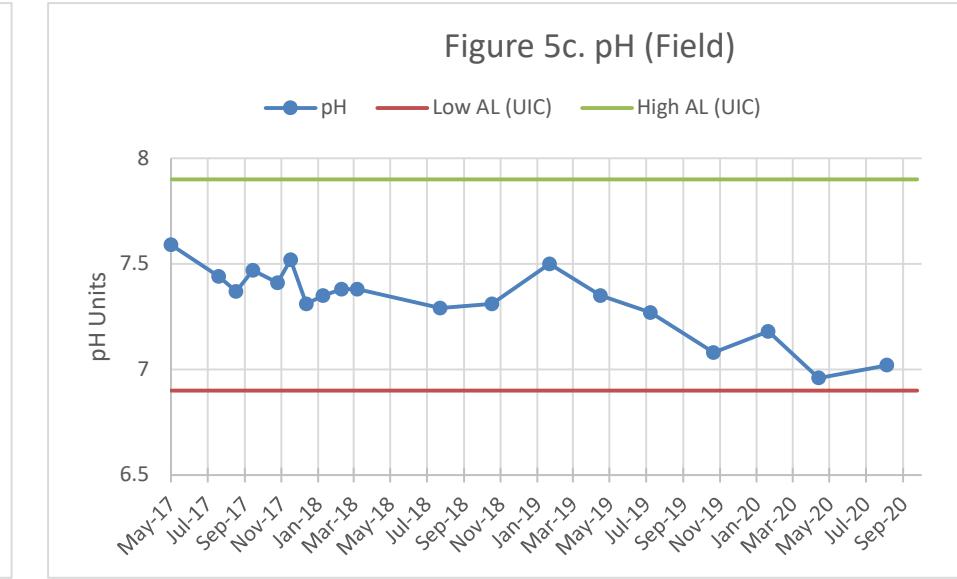
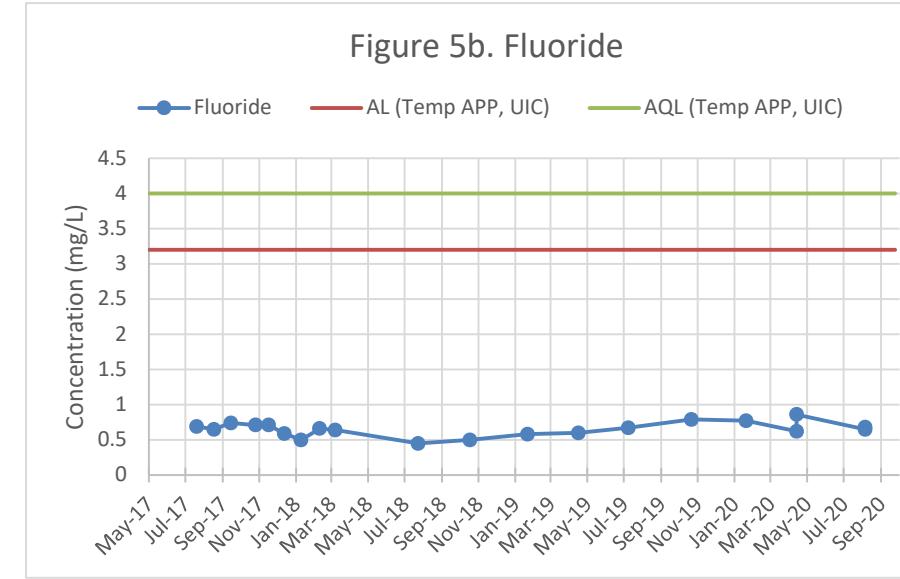
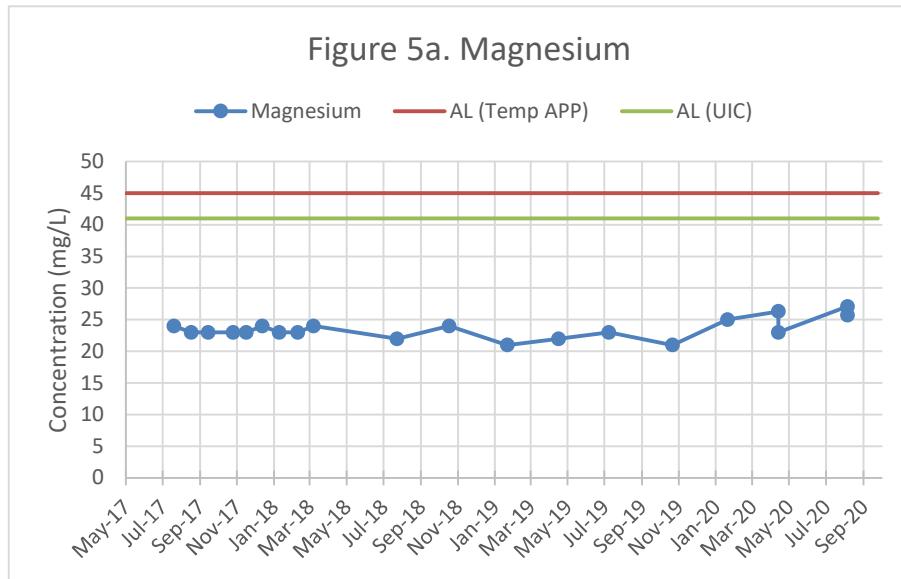
SW APP = Sitewide APP No. P-101704

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M52-UBF QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

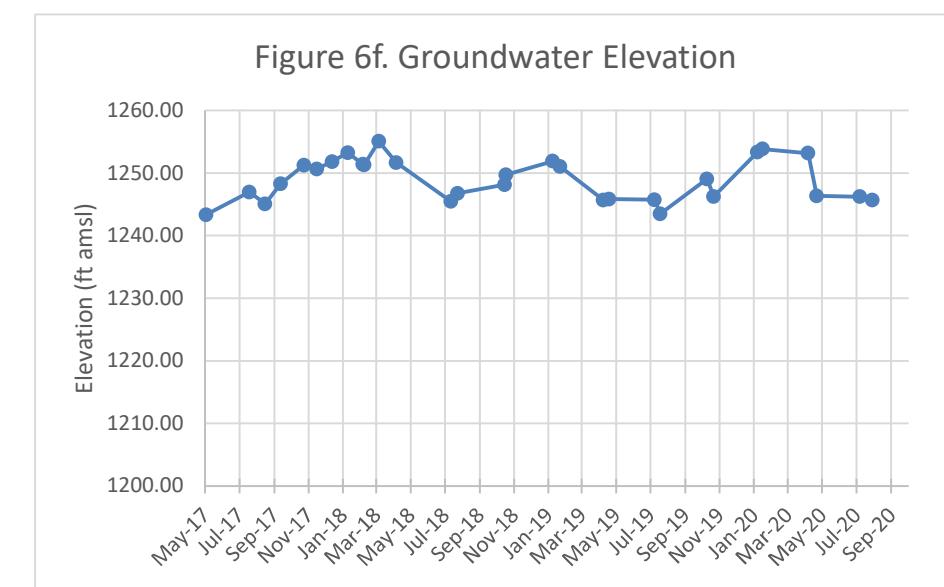
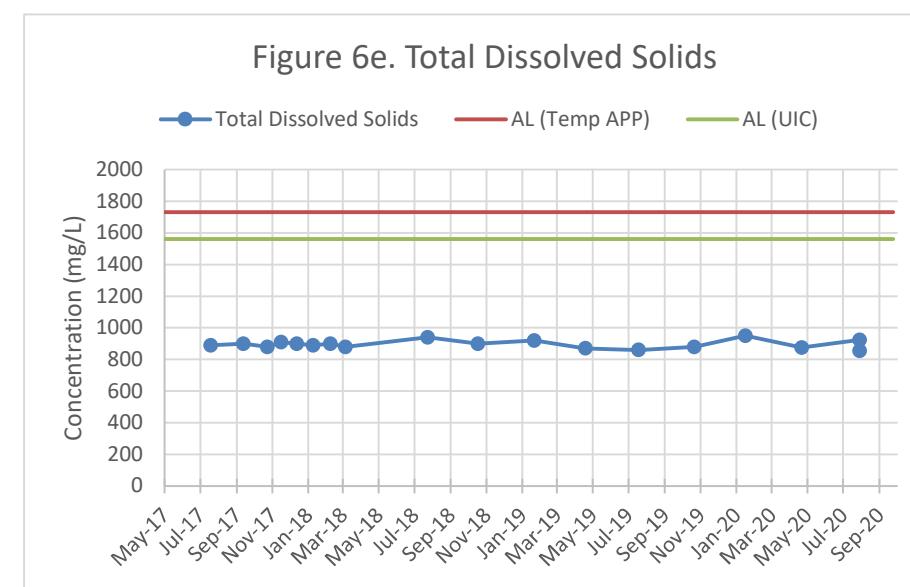
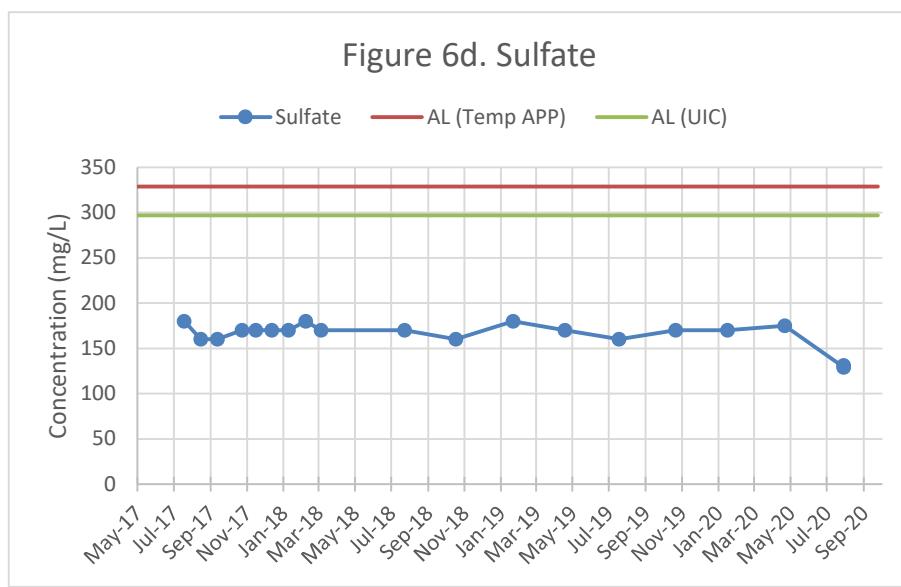
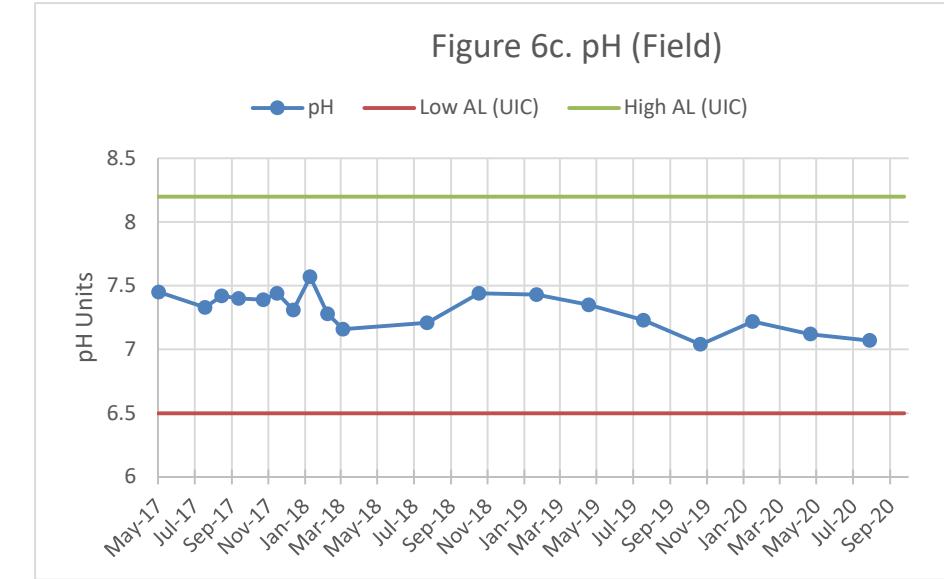
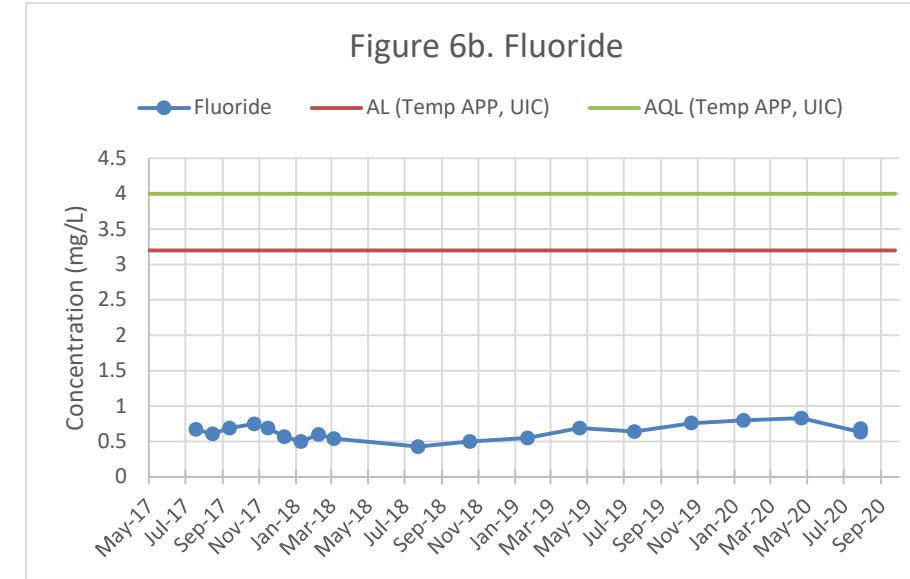
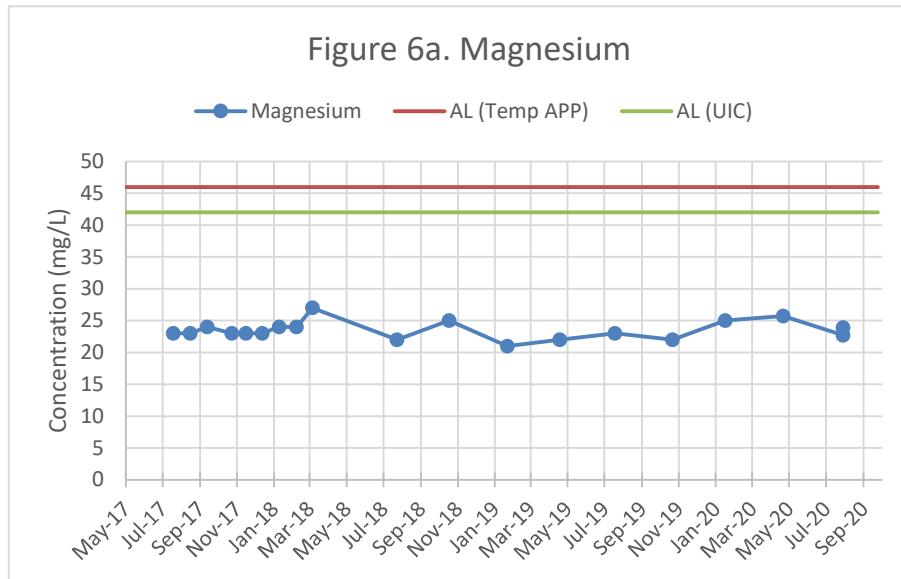
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M54-LBF QUARTERLY CONCENTRATION GRAPHS



Notes:

Historical outliers removed from graphs for visual representation, but are maintained in the dataset.

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M54-O QUARTERLY CONCENTRATION GRAPHS

Figure 7a. Magnesium

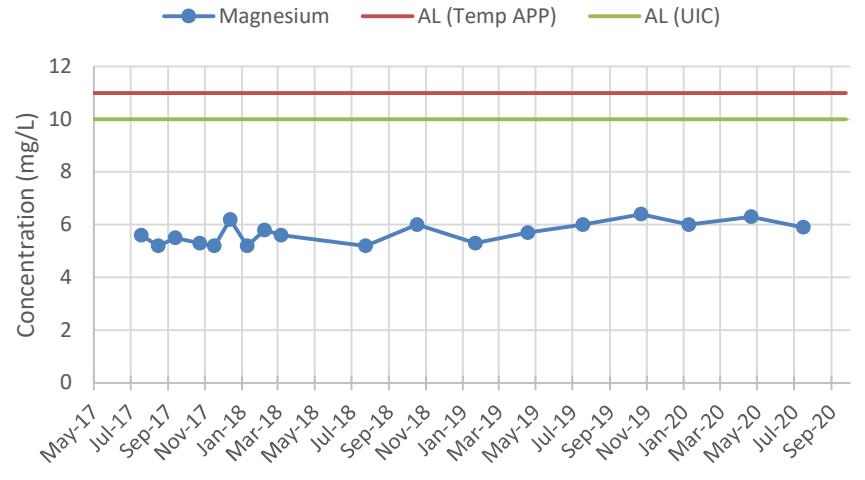


Figure 7b. Fluoride

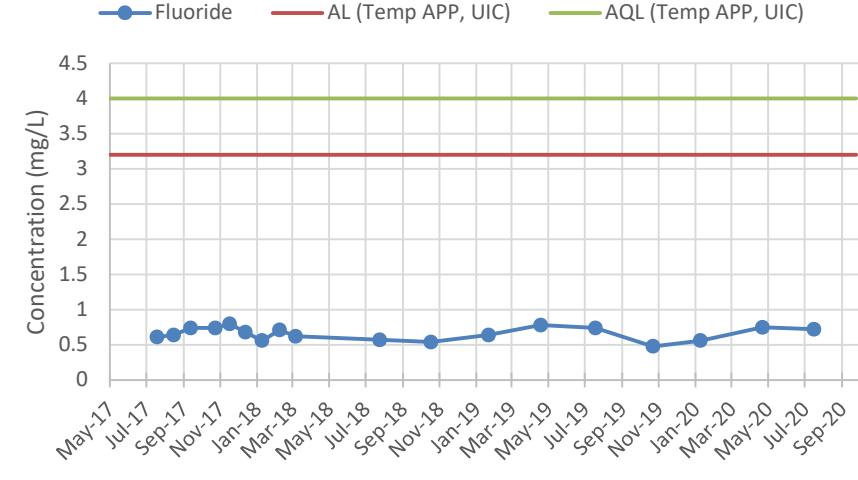


Figure 7c. pH (Field)

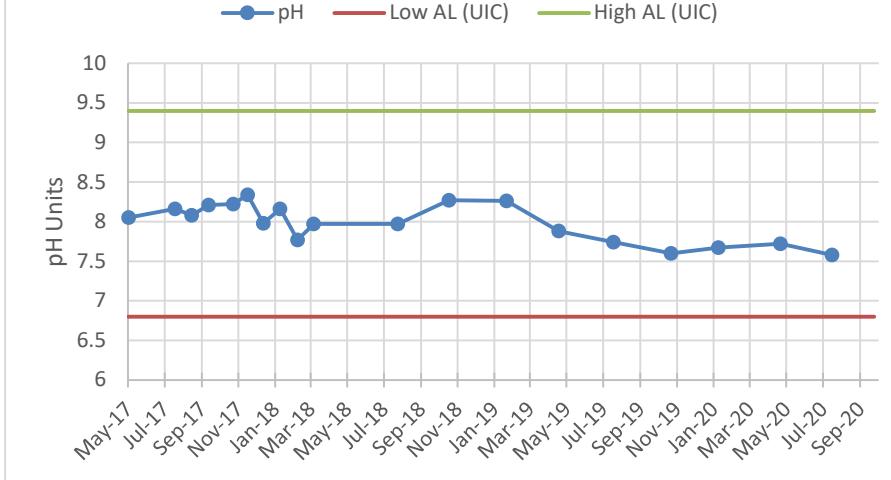


Figure 7d. Sulfate

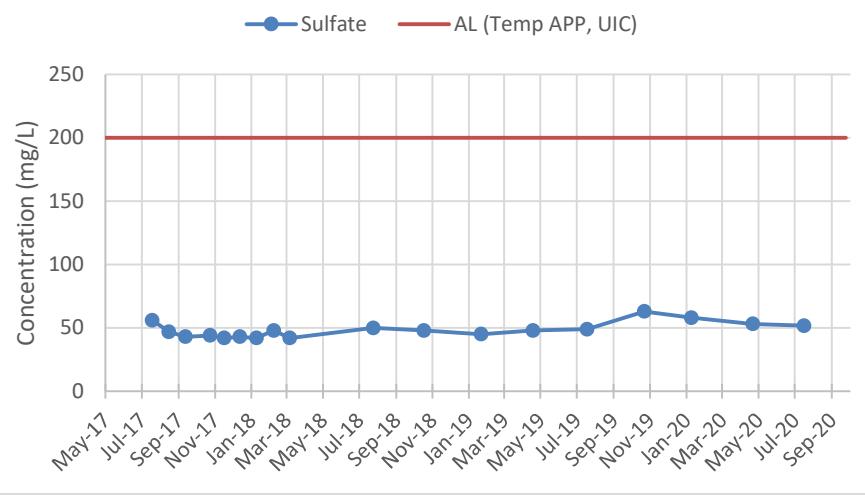


Figure 7e. Total Dissolved Solids

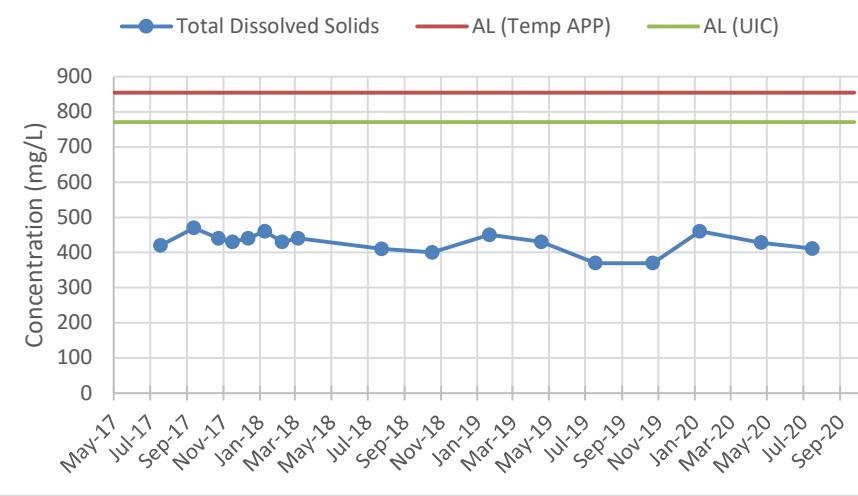
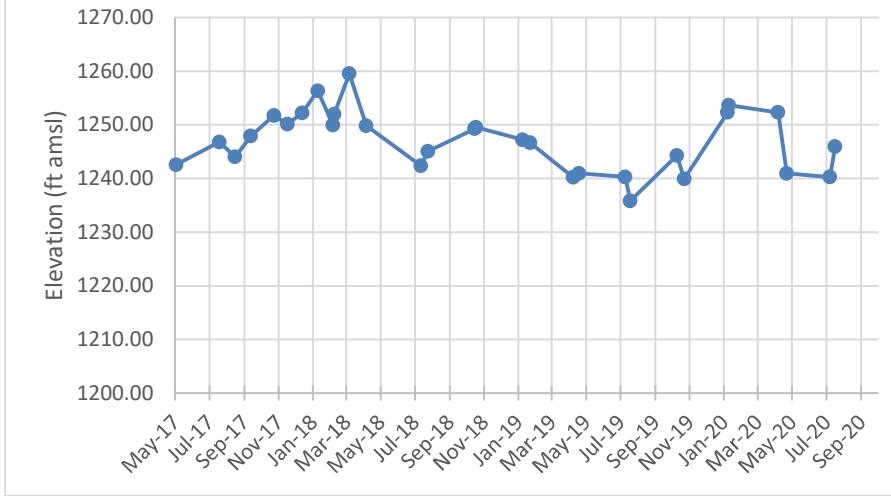


Figure 7f. Groundwater Elevation



Notes:

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M55-UBF QUARTERLY CONCENTRATION GRAPHS

Figure 8a. Magnesium

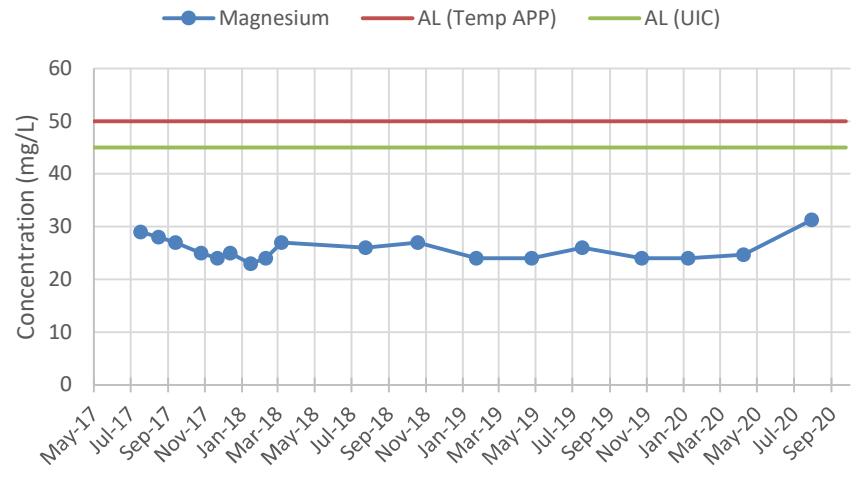


Figure 8b. Fluoride

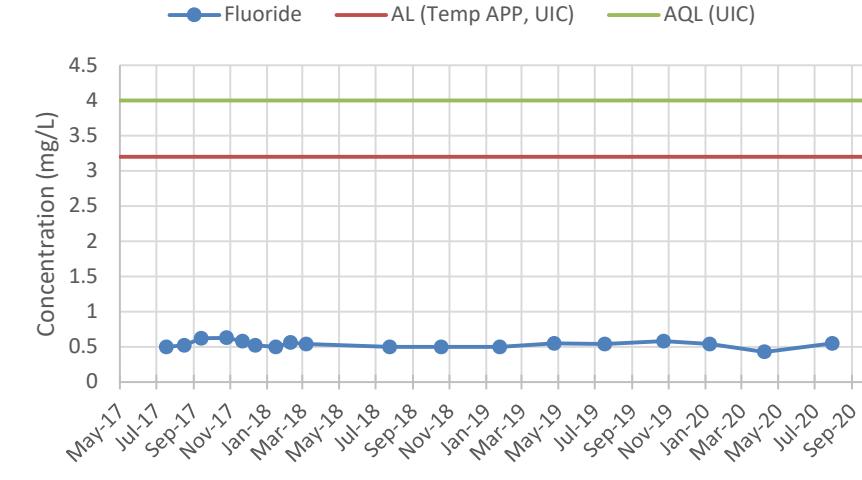


Figure 8c. pH (Field)

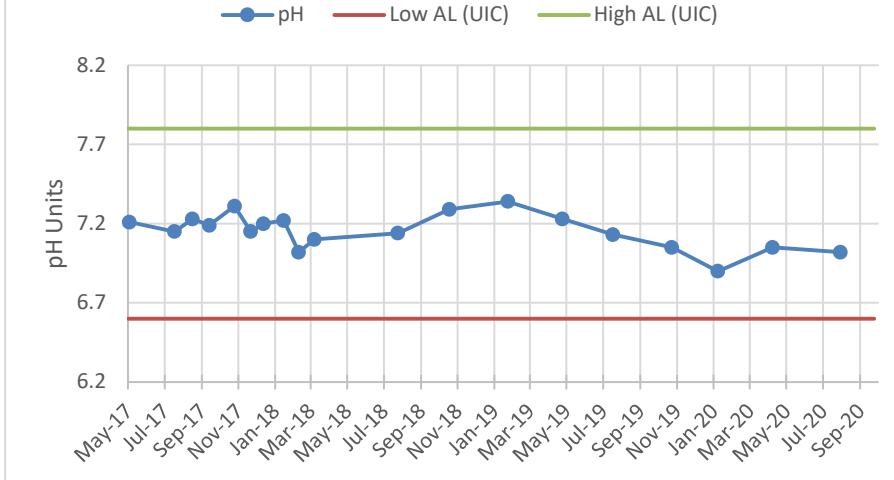


Figure 8d. Sulfate

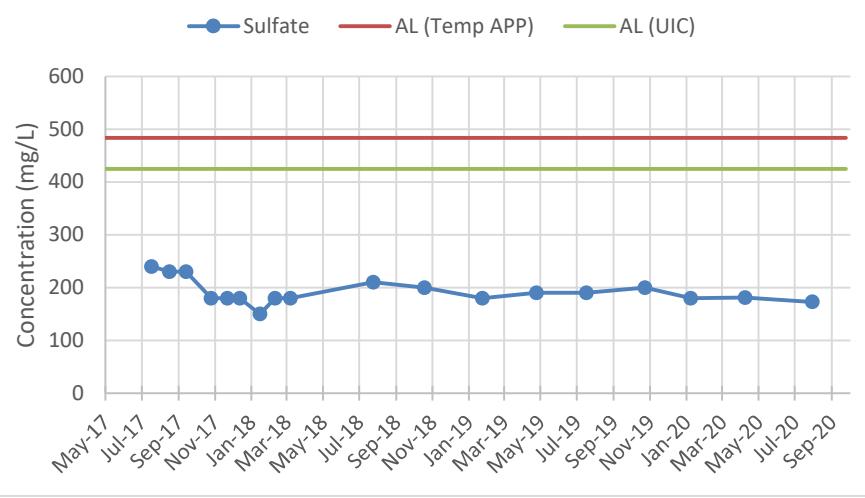


Figure 8e. Total Dissolved Solids

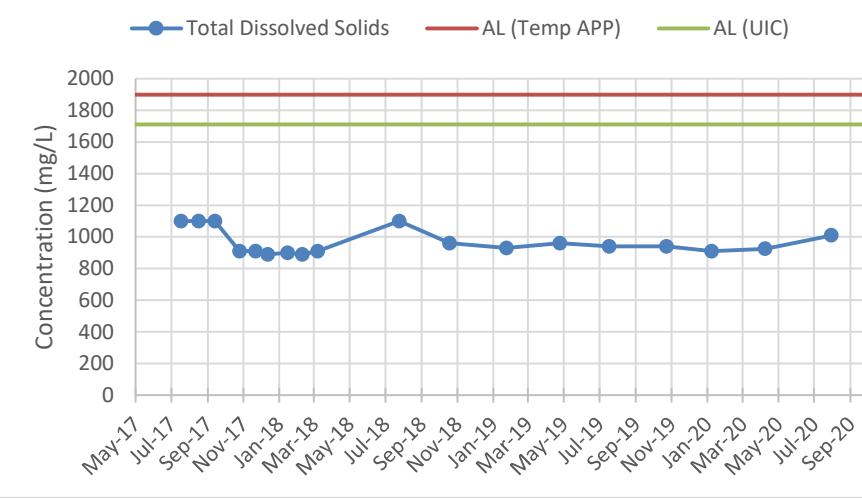
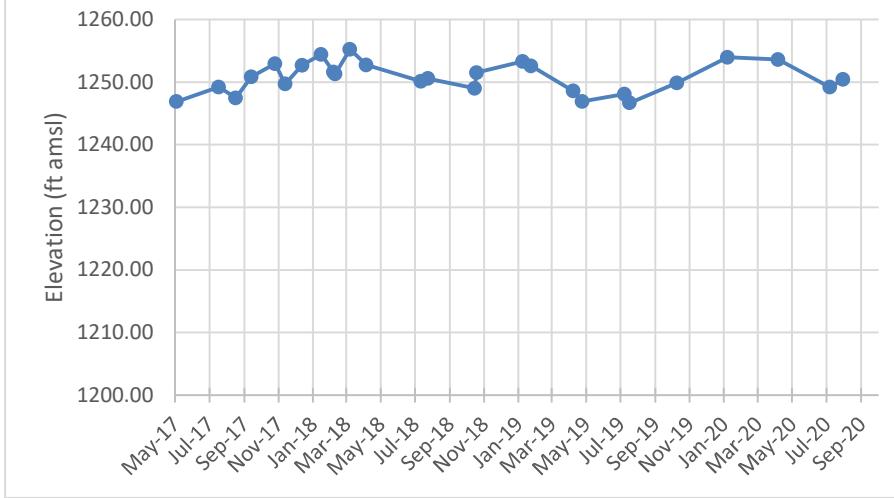


Figure 8f. Groundwater Elevation



Notes:

AL = Alert level

APP = Aquifer Protection Permit

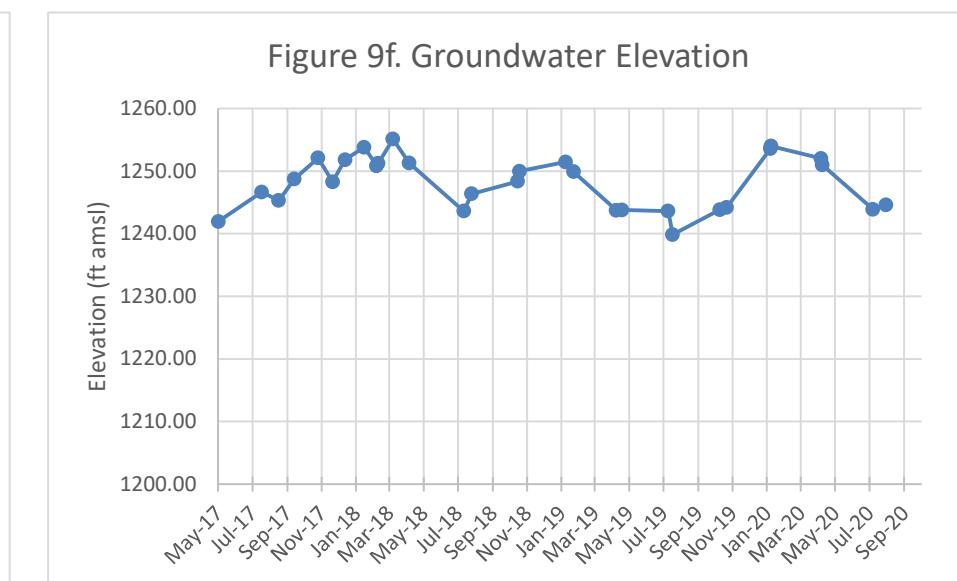
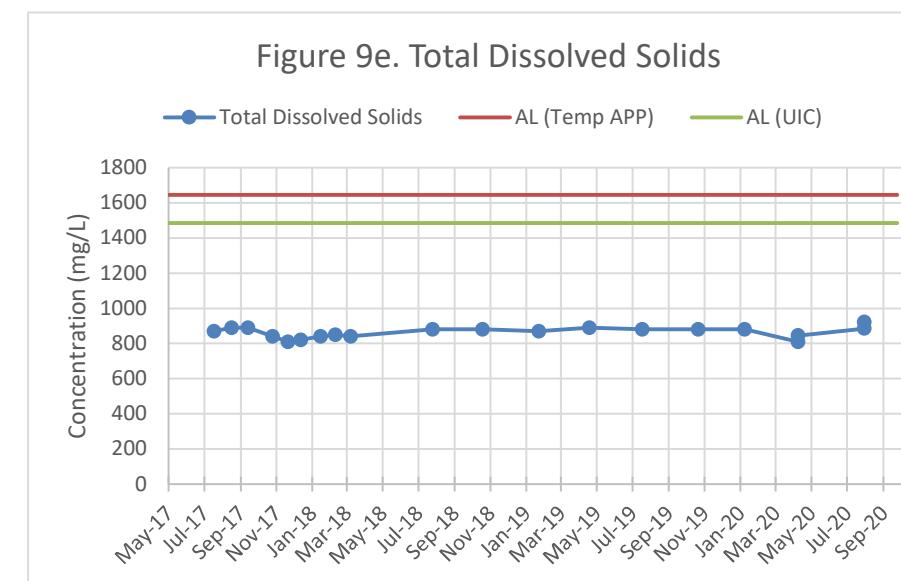
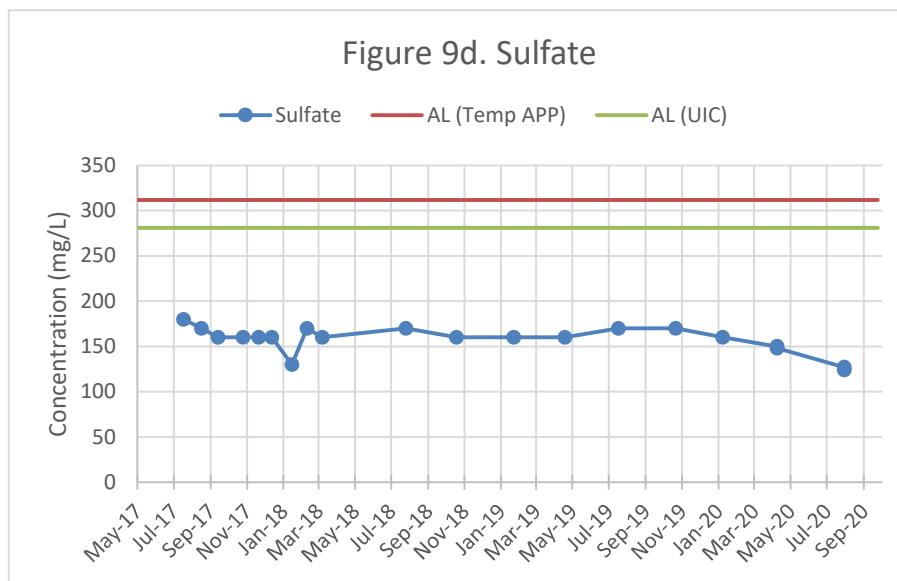
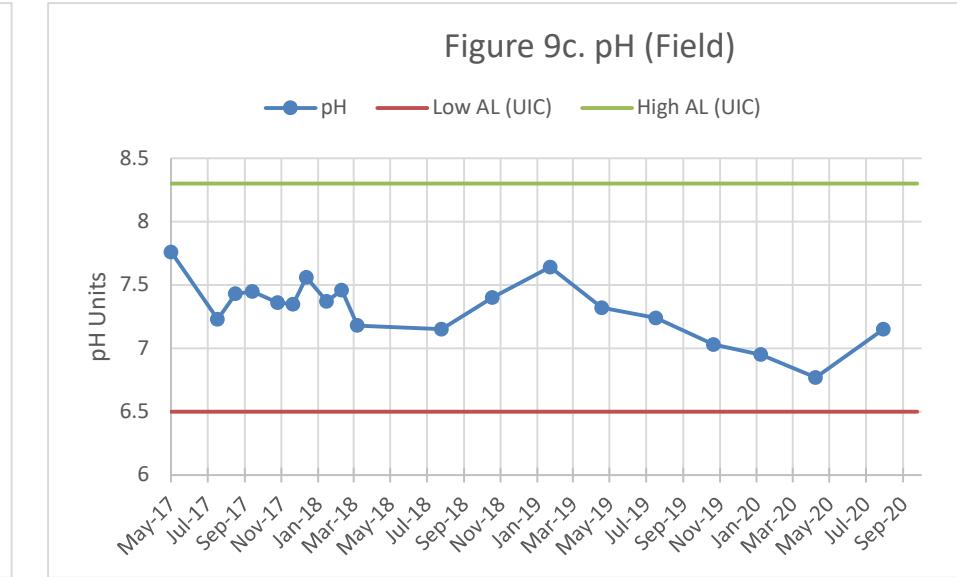
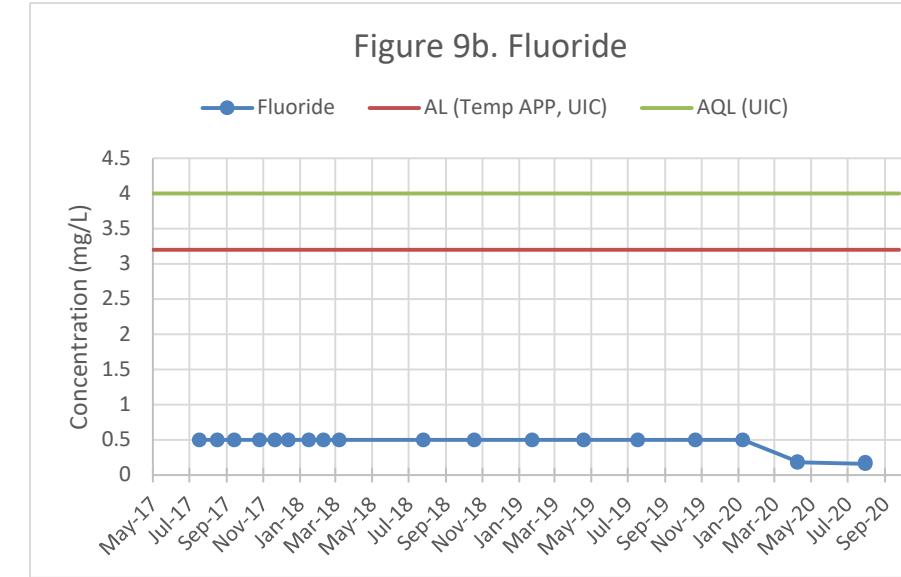
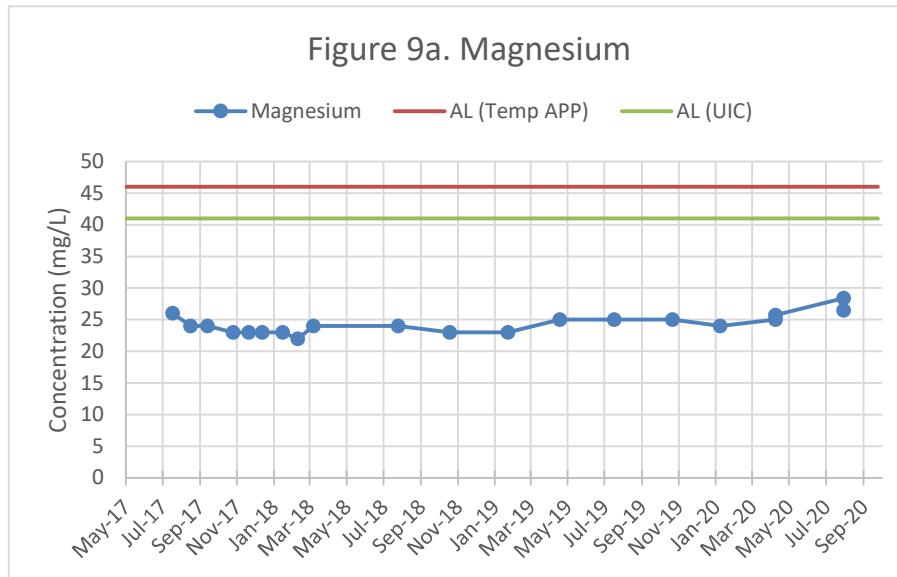
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M56-LBF QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M57-O QUARTERLY CONCENTRATION GRAPHS

Figure 10a. Magnesium

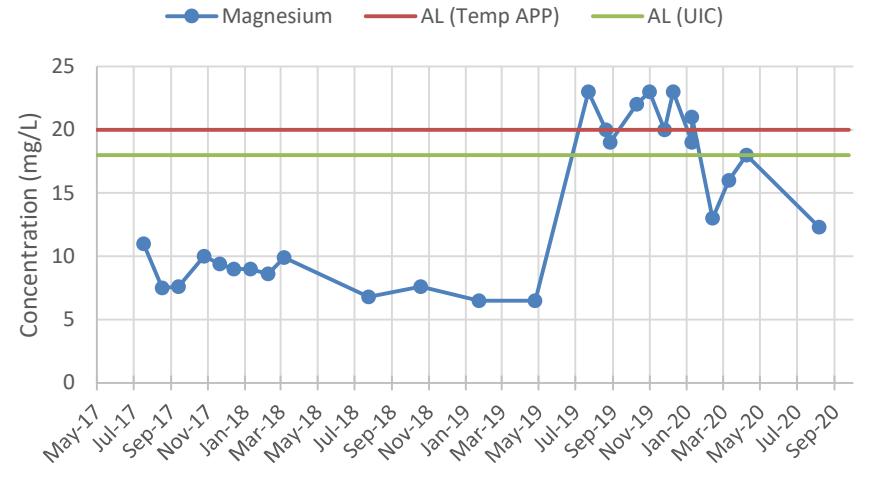


Figure 10b. Fluoride

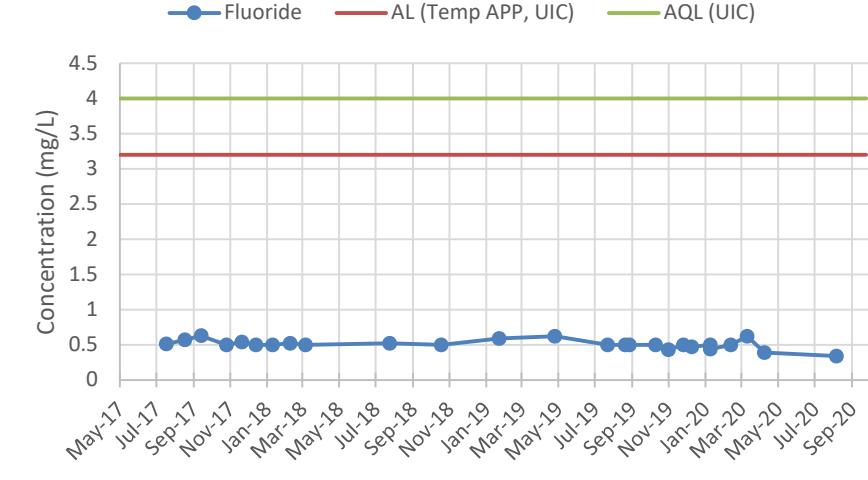


Figure 10c. pH (Field)

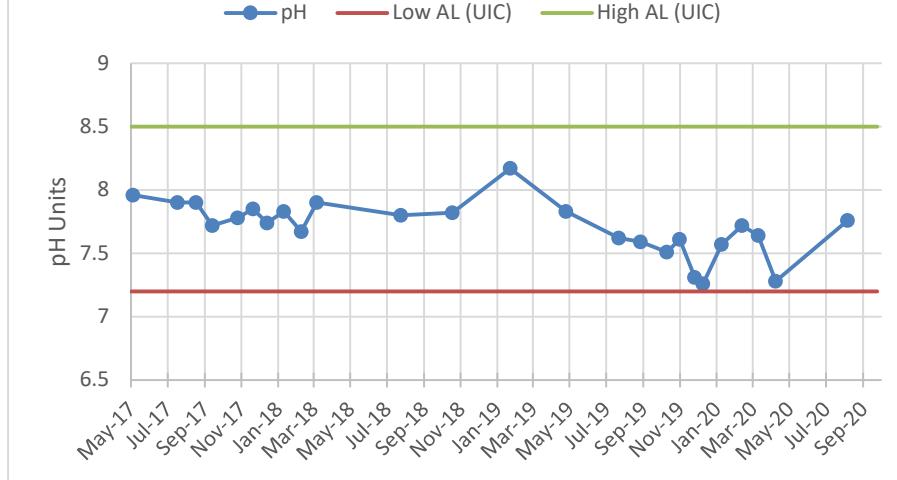


Figure 10d. Sulfate

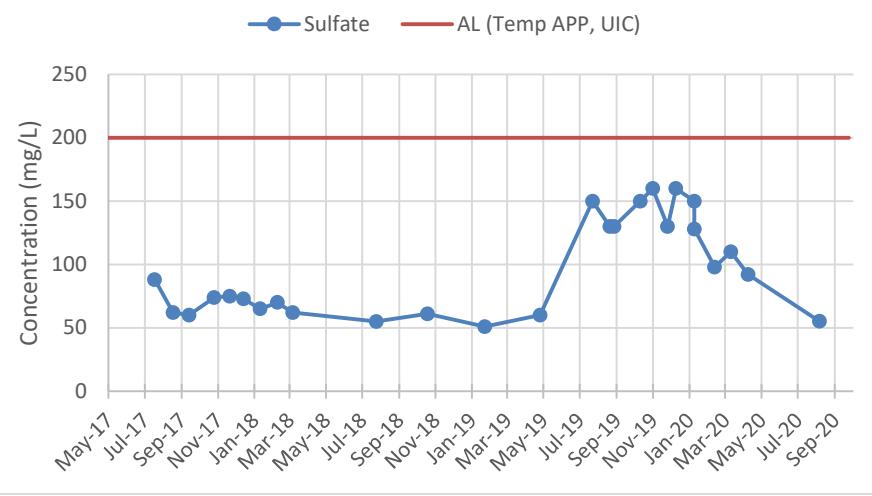


Figure 10e. Total Dissolved Solids

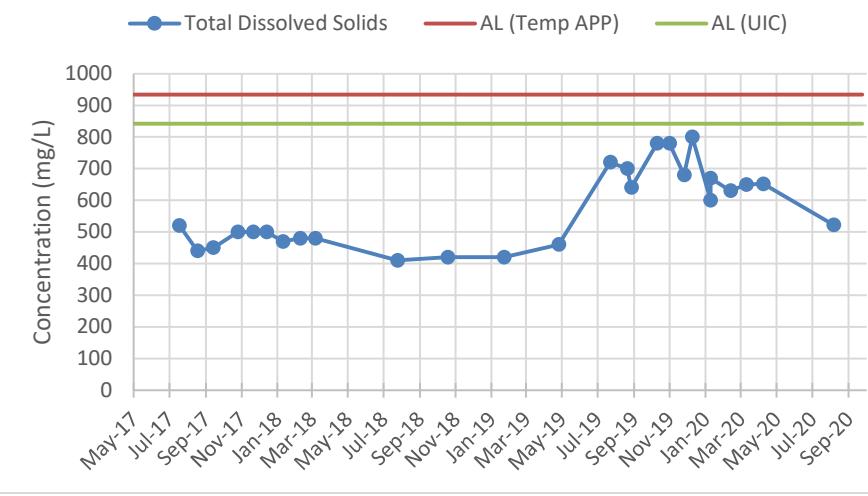
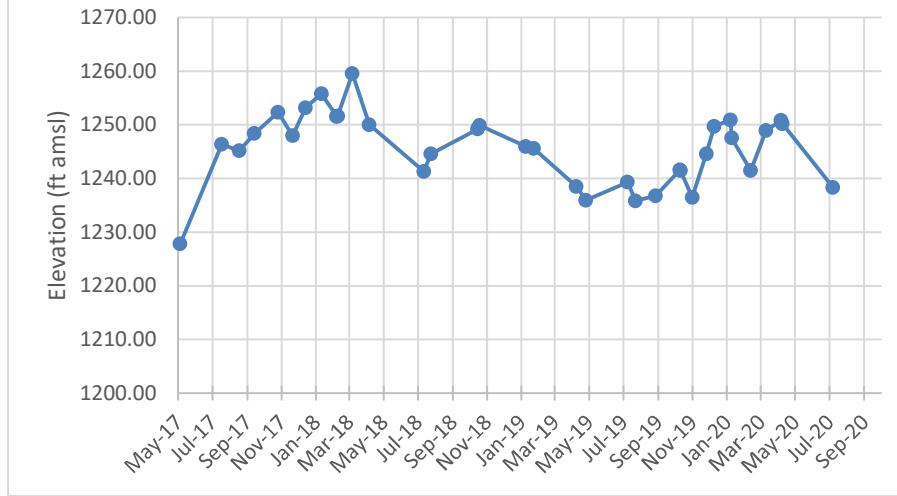


Figure 10f. Groundwater Elevation



Notes:

AL = Alert level

APP = Aquifer Protection Permit

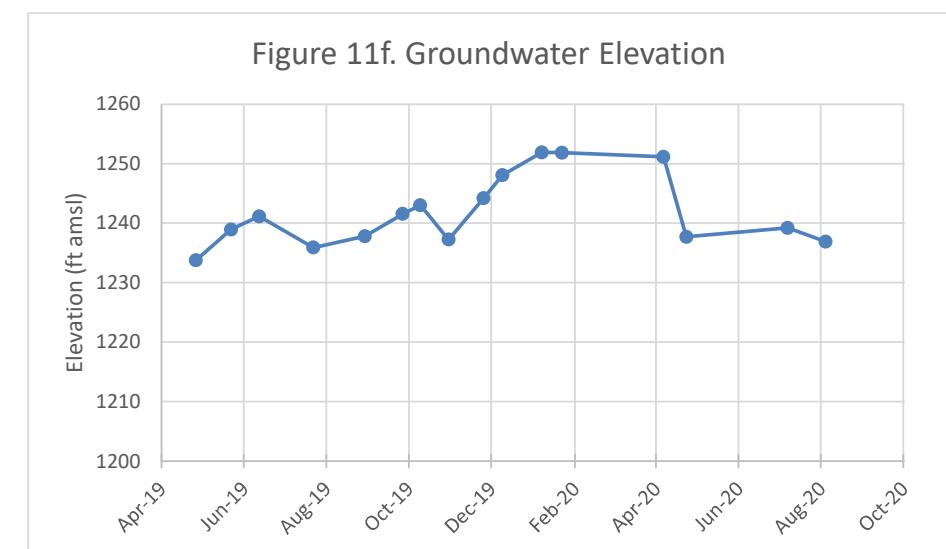
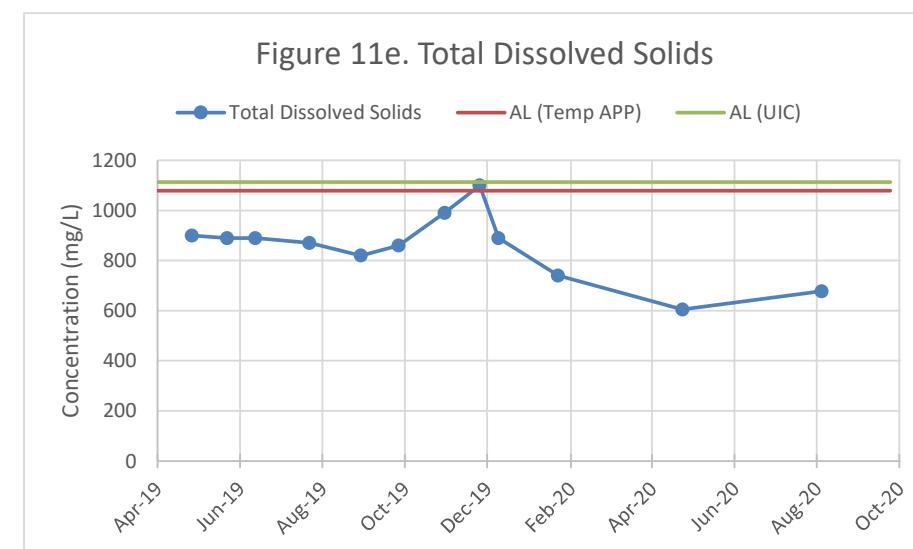
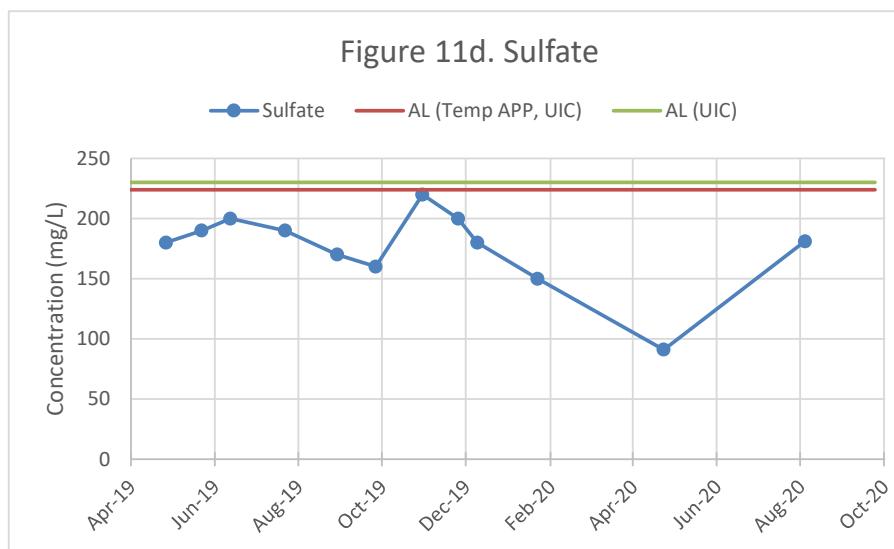
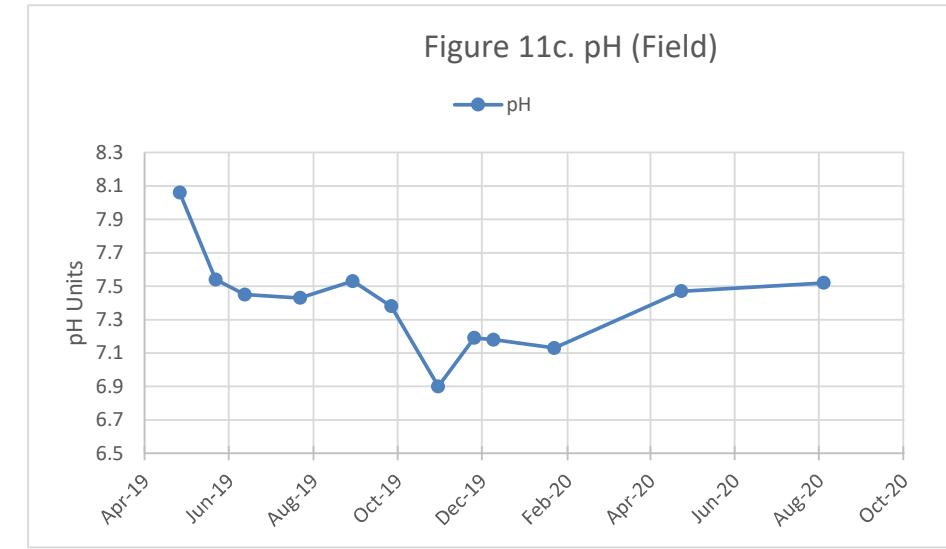
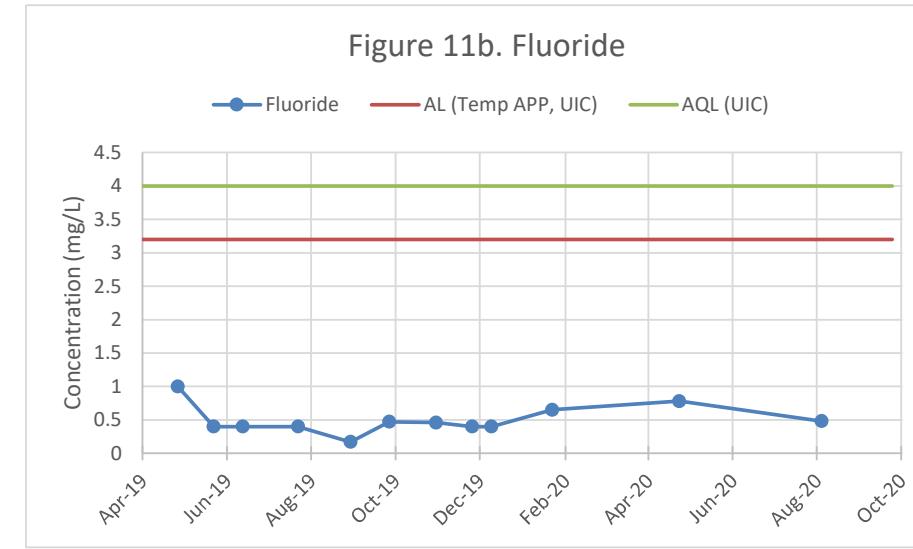
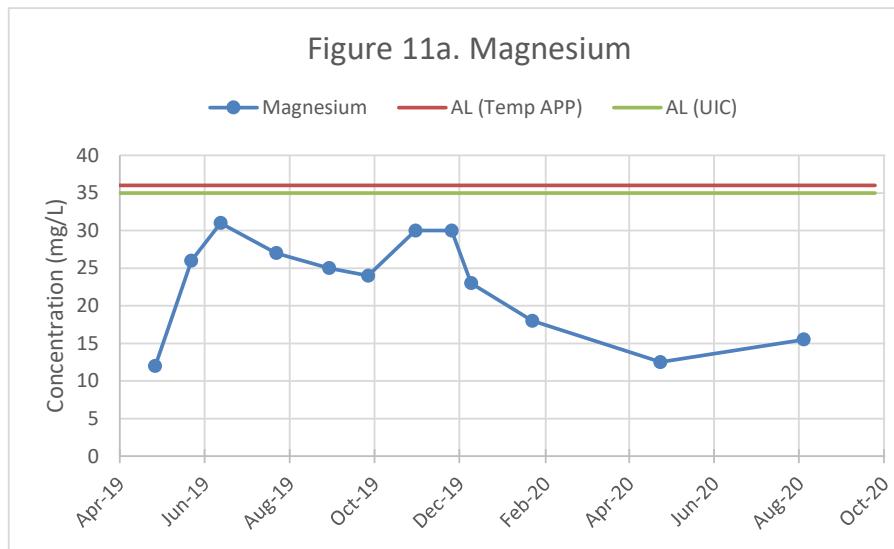
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M57R-O QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

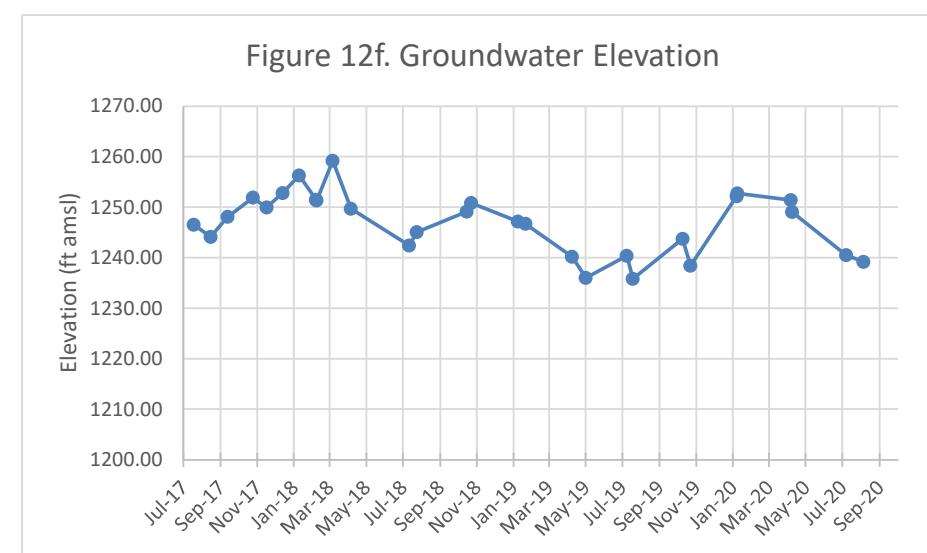
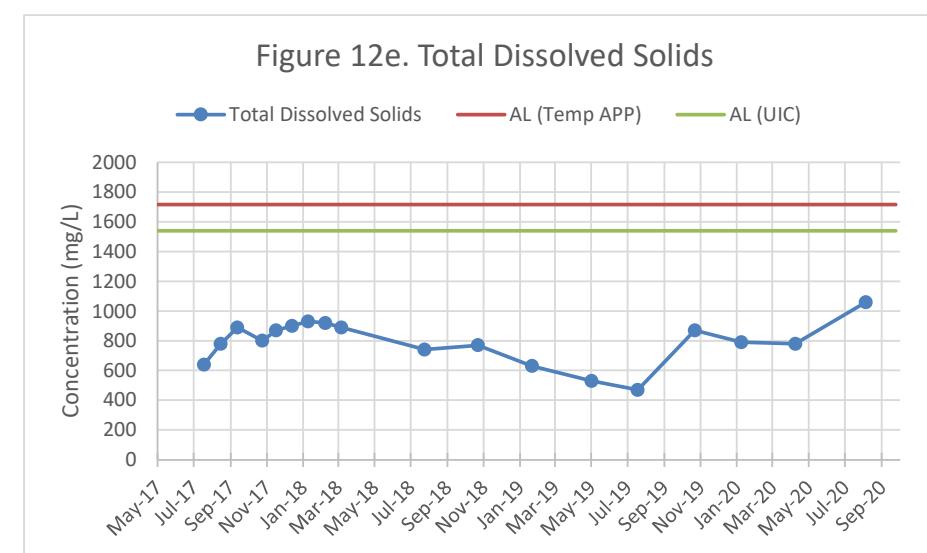
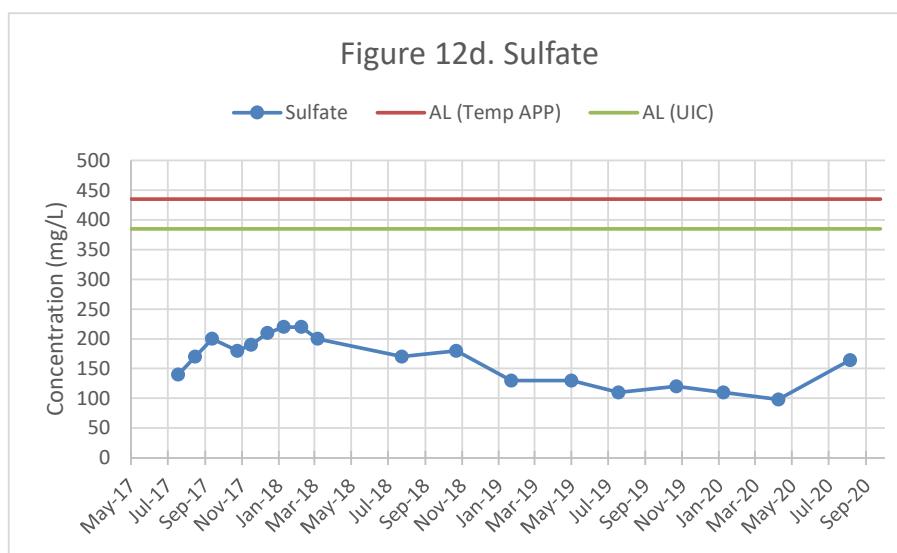
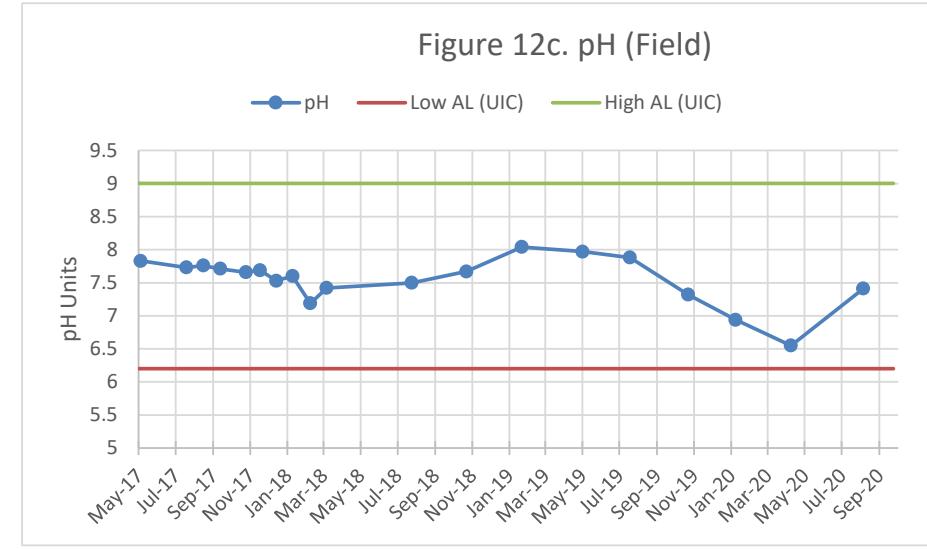
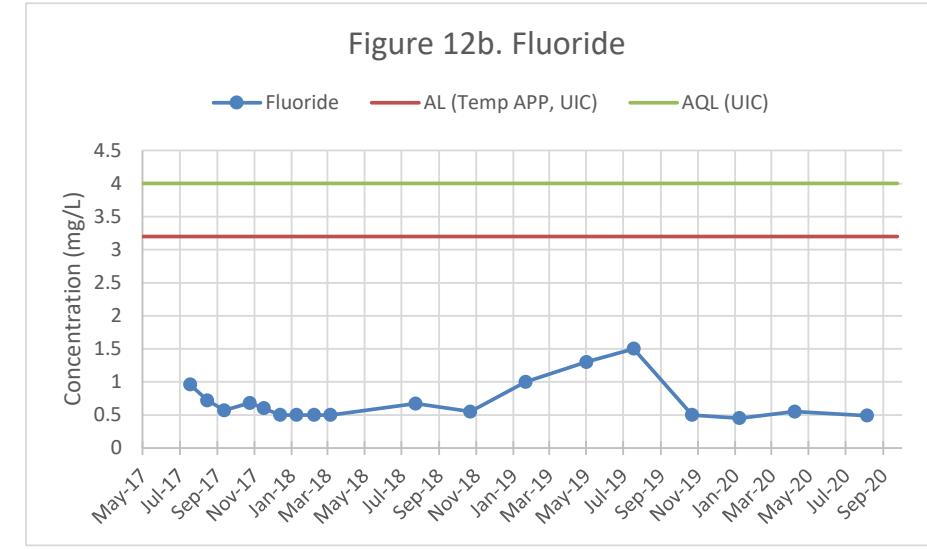
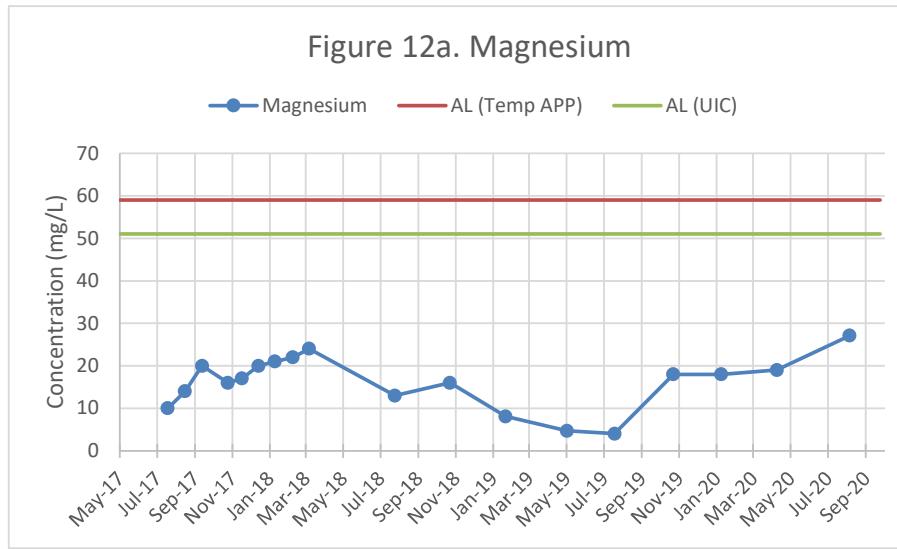
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M58-O QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

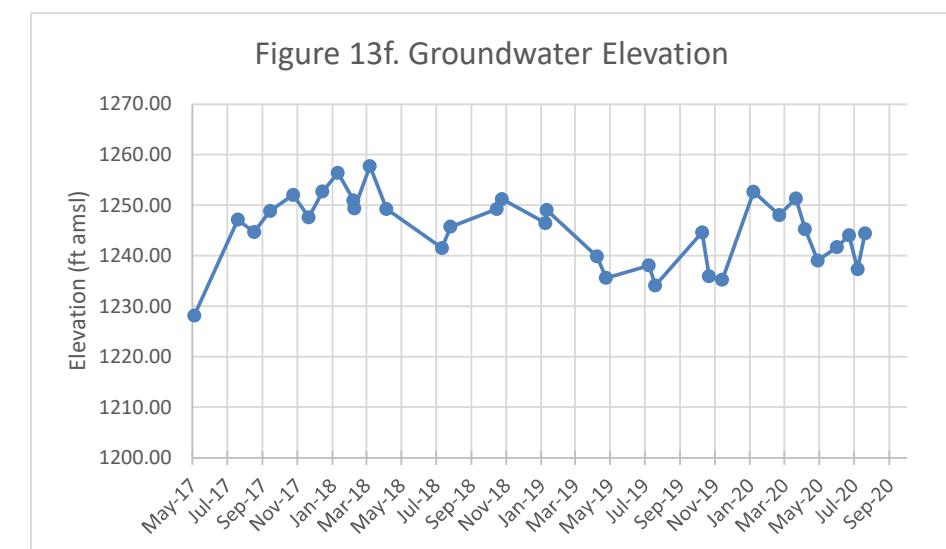
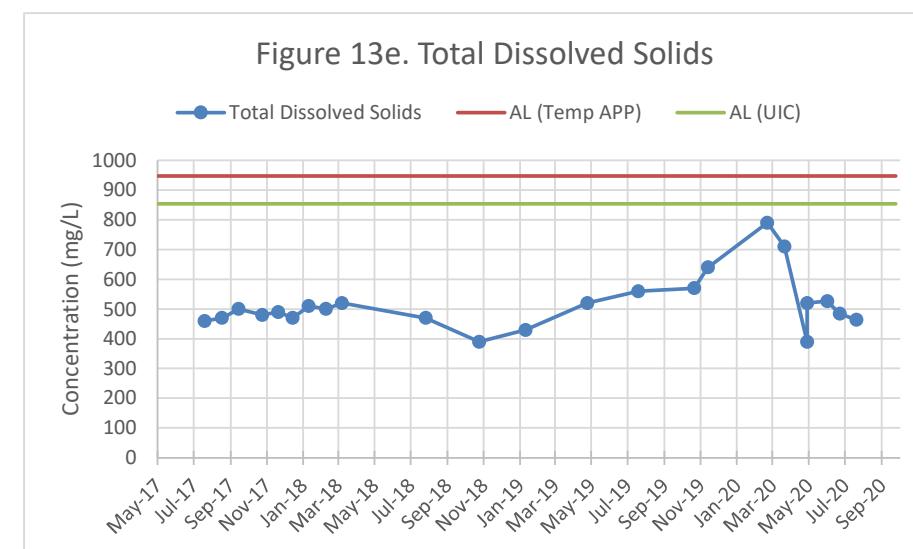
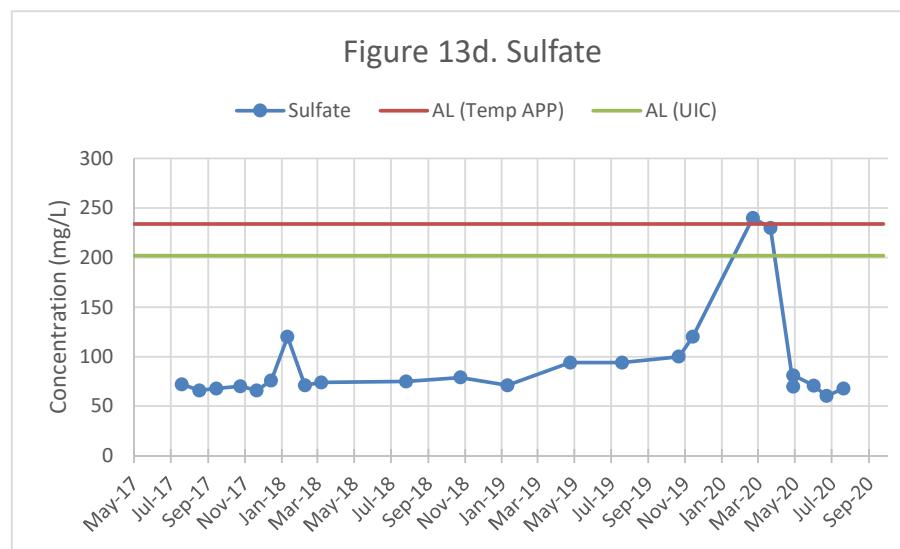
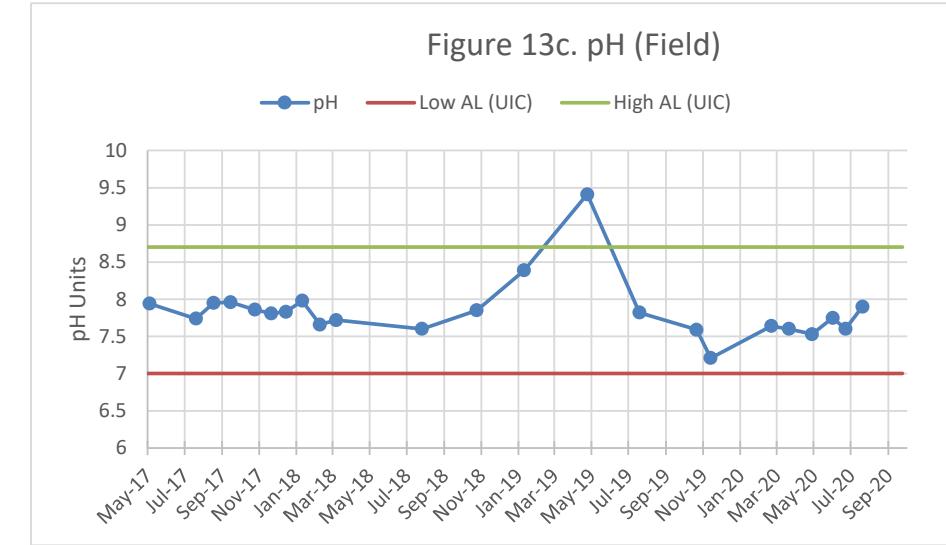
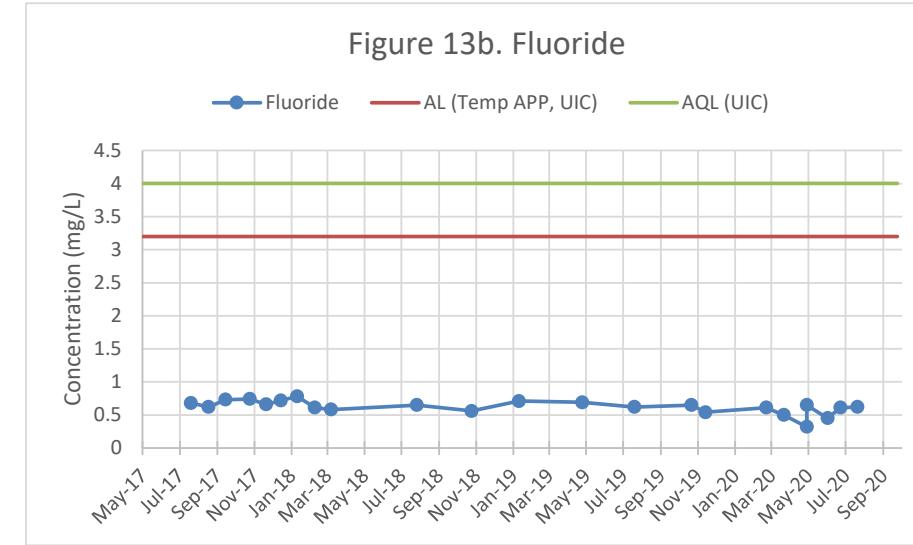
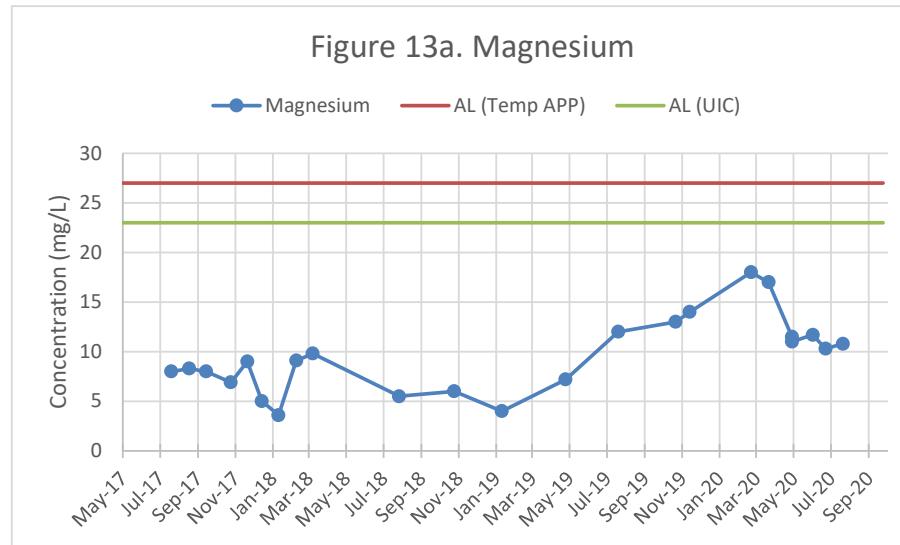
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M59-O QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

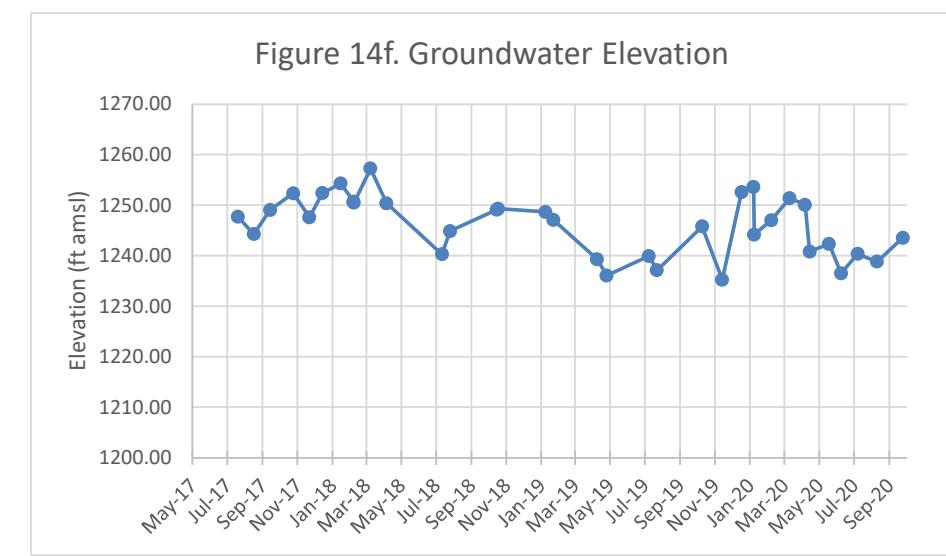
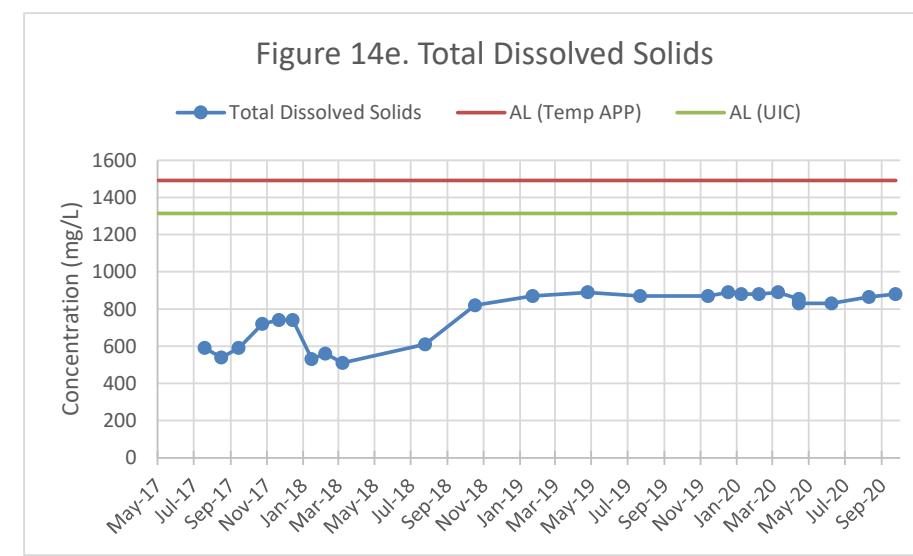
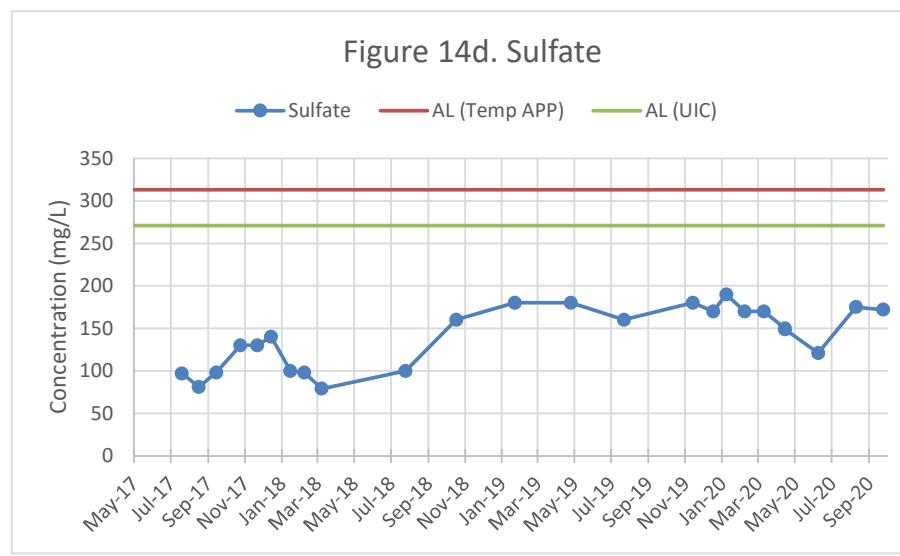
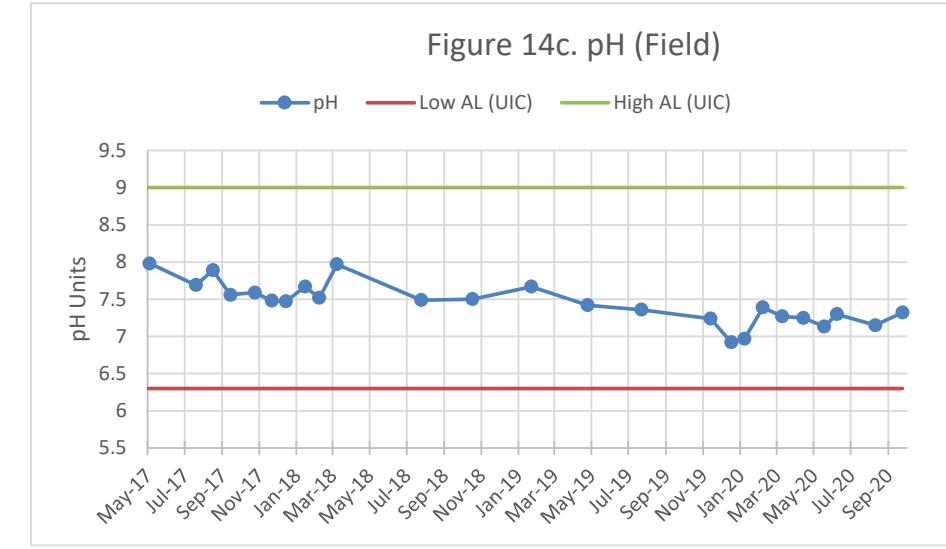
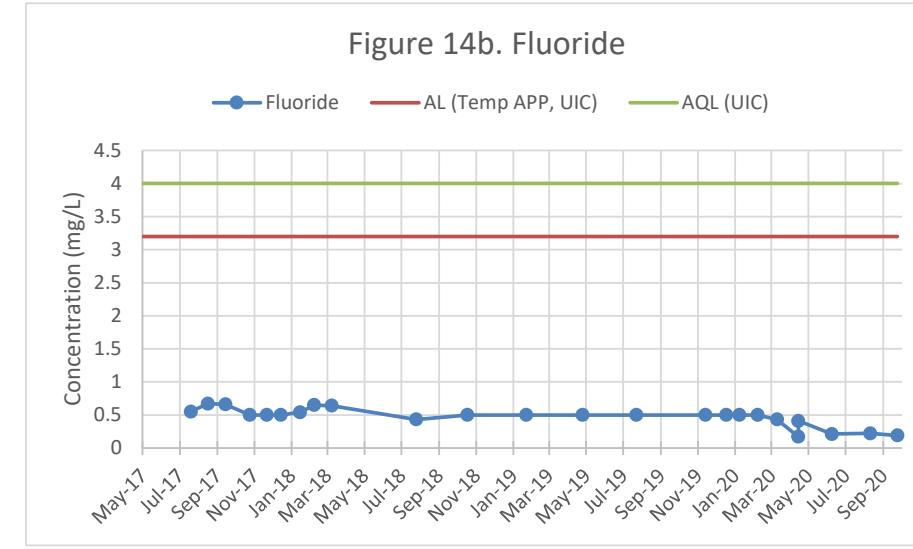
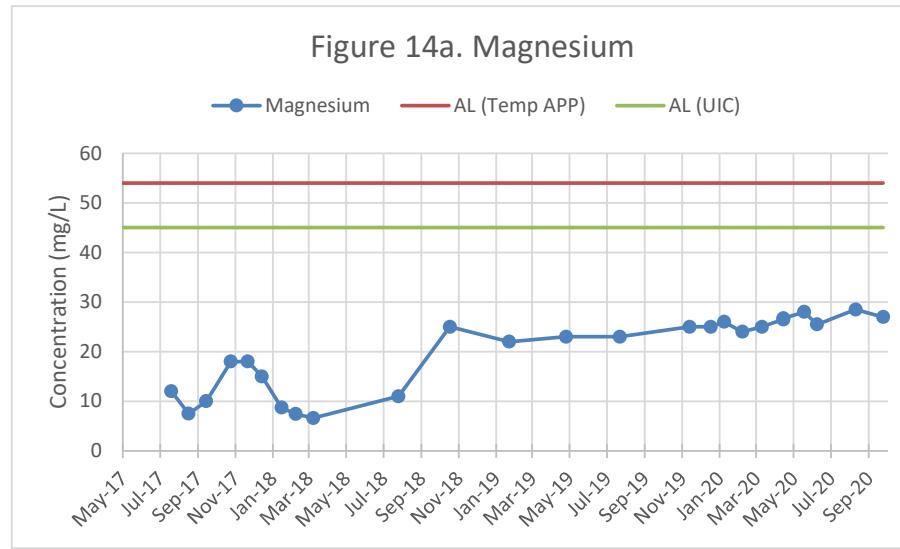
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M60-O QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

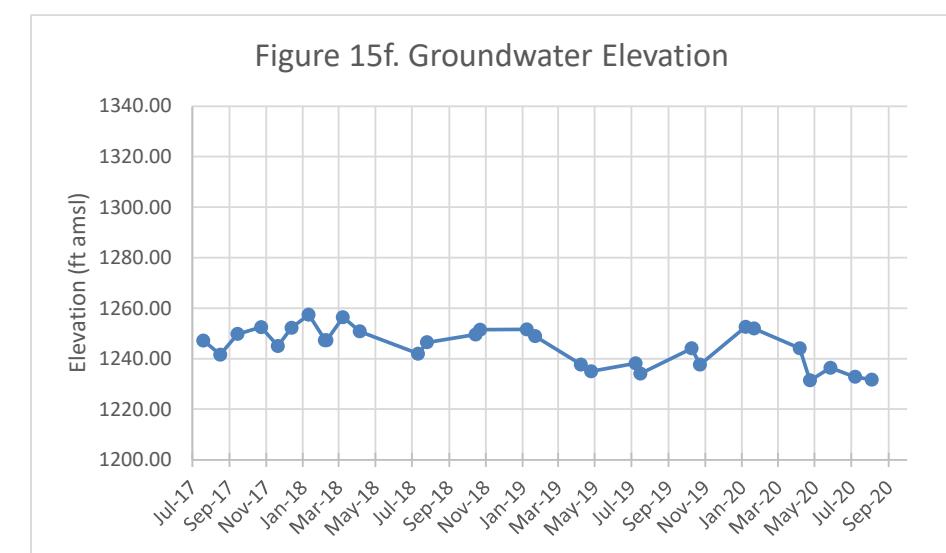
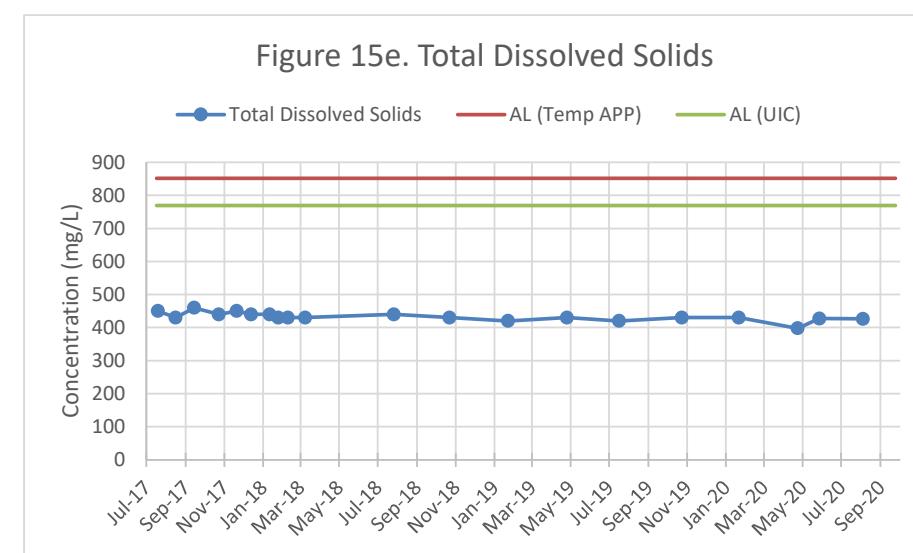
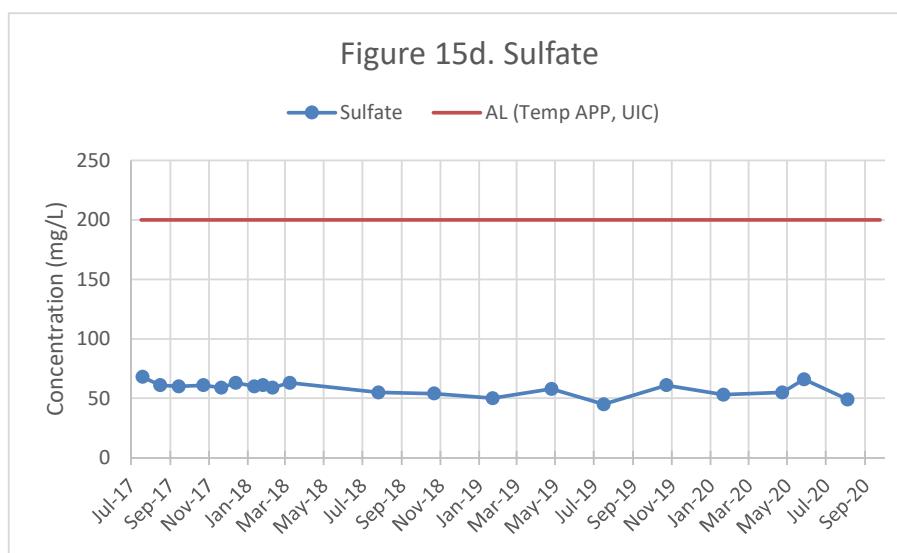
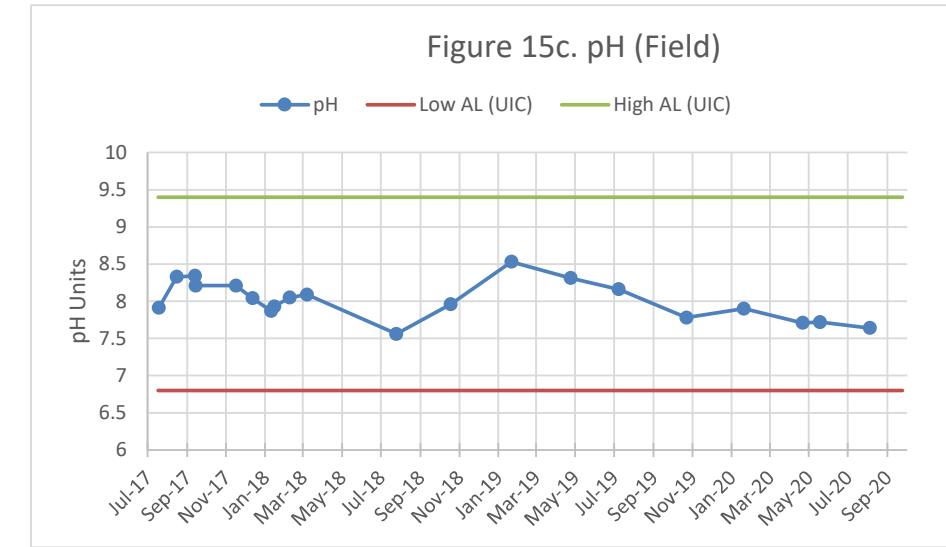
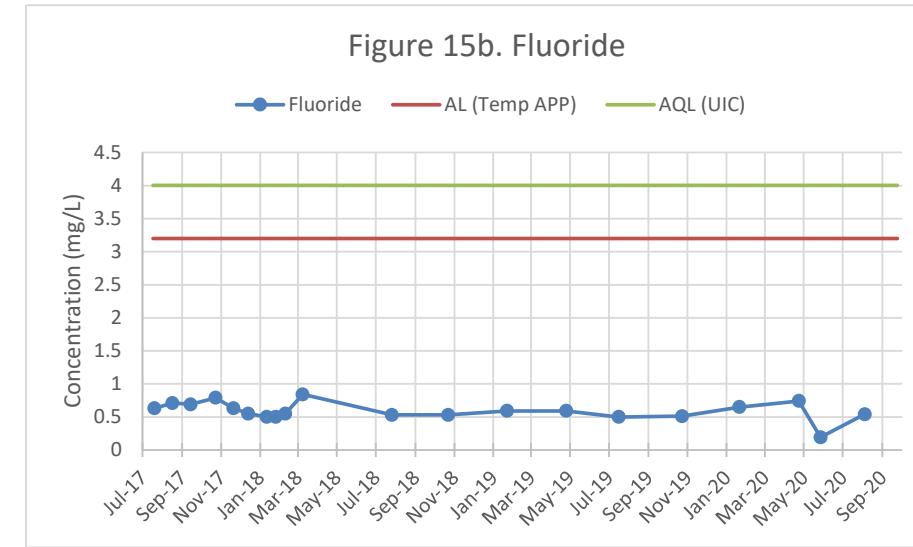
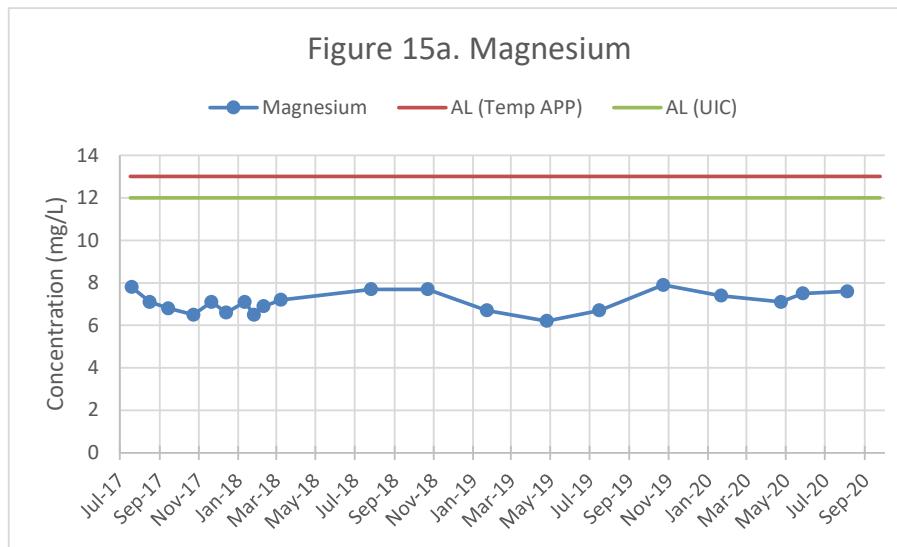
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

M61-LBF QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

MW-01-LBF QUARTERLY CONCENTRATION GRAPHS

Figure 16a. Magnesium

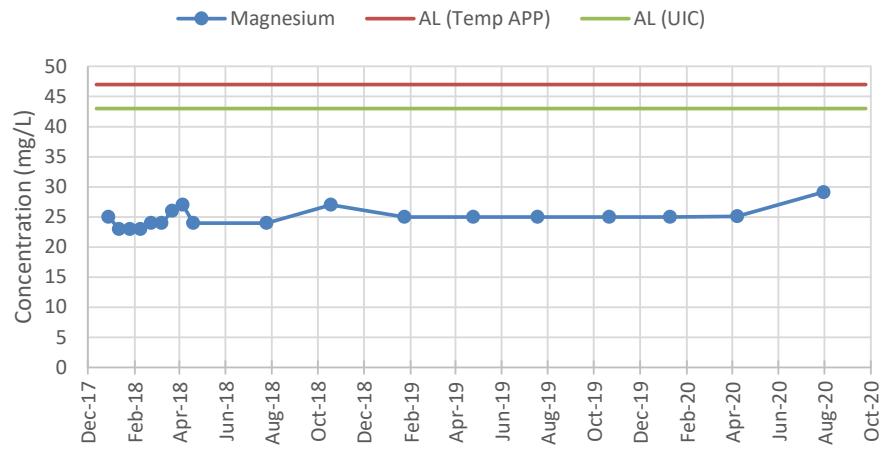


Figure 16b. Fluoride

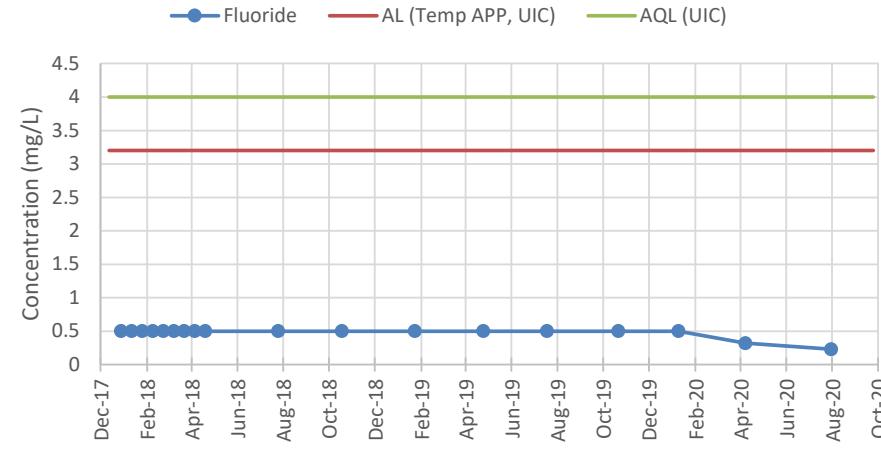


Figure 16c. pH (Field)

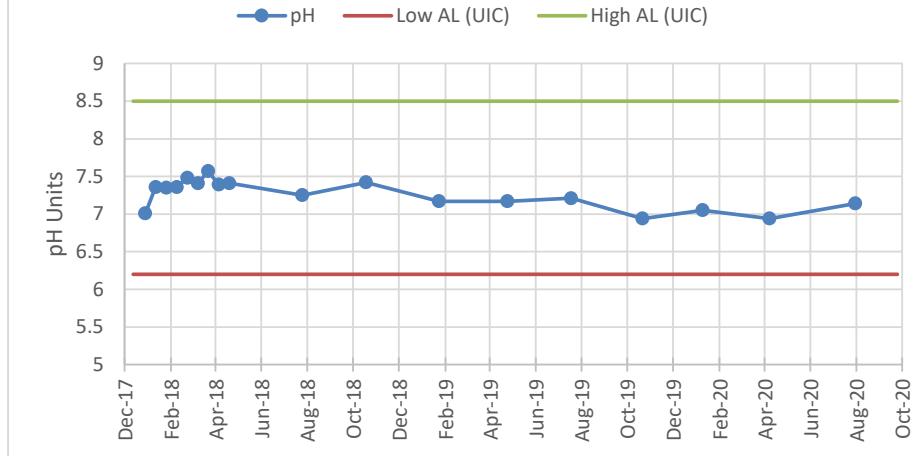


Figure 16d. Sulfate

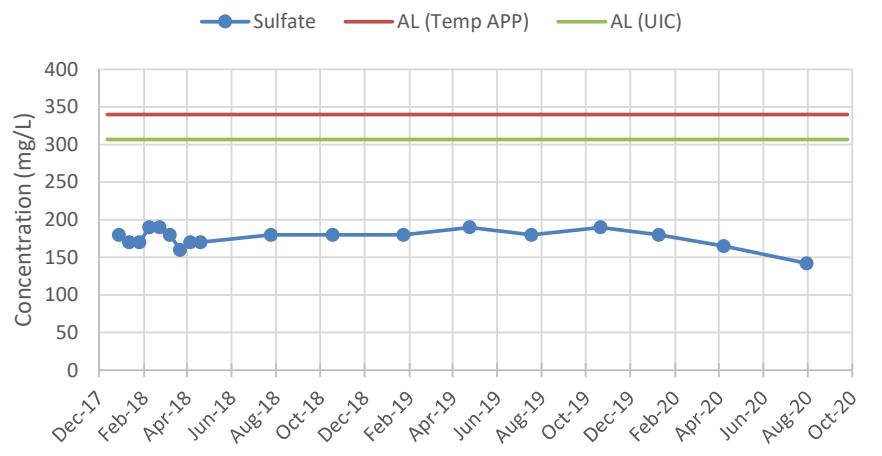


Figure 16e. Total Dissolved Solids

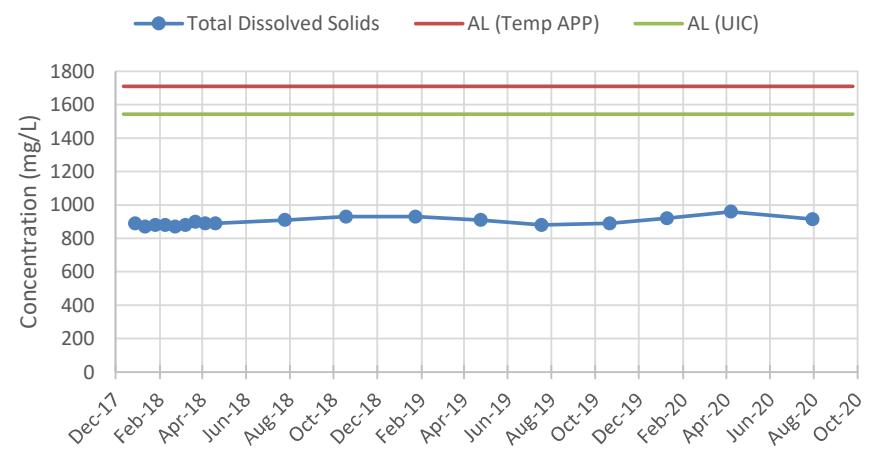
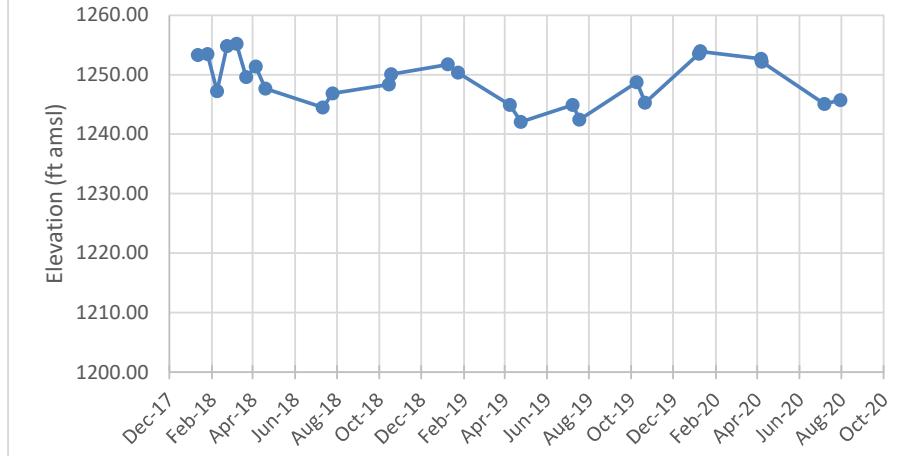


Figure 16f. Groundwater Elevation



Notes:

AL = Alert level

APP = Aquifer Protection Permit

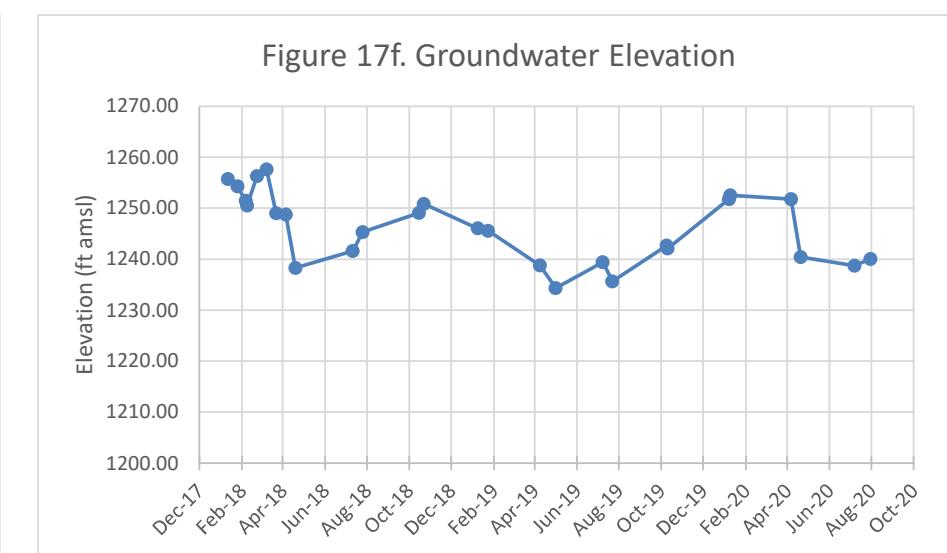
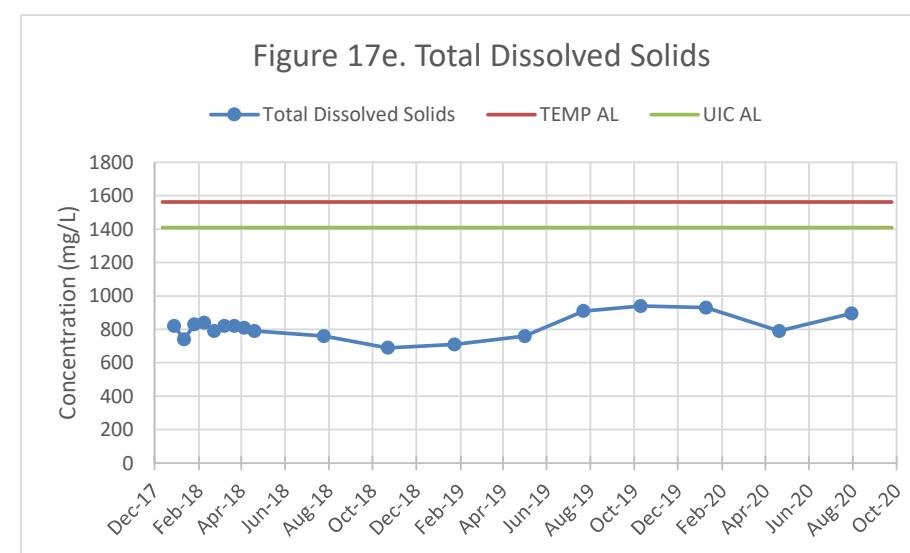
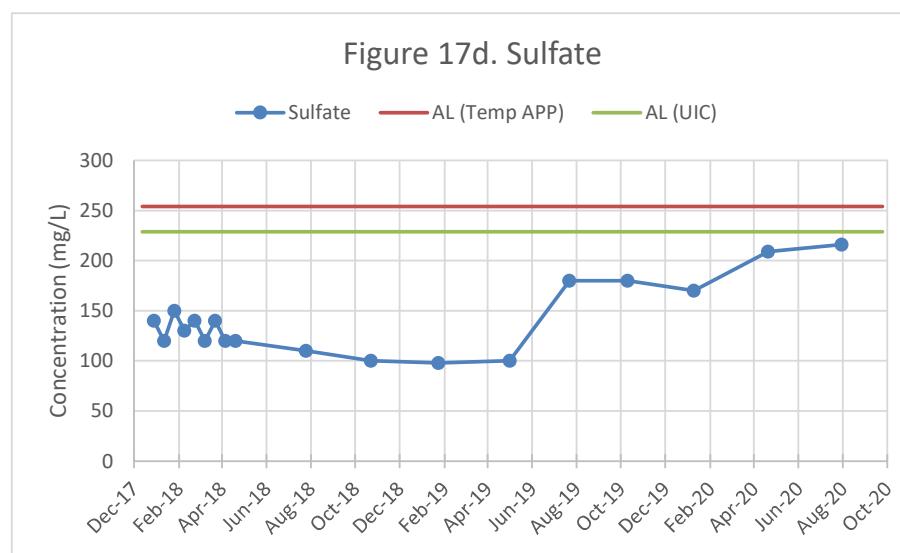
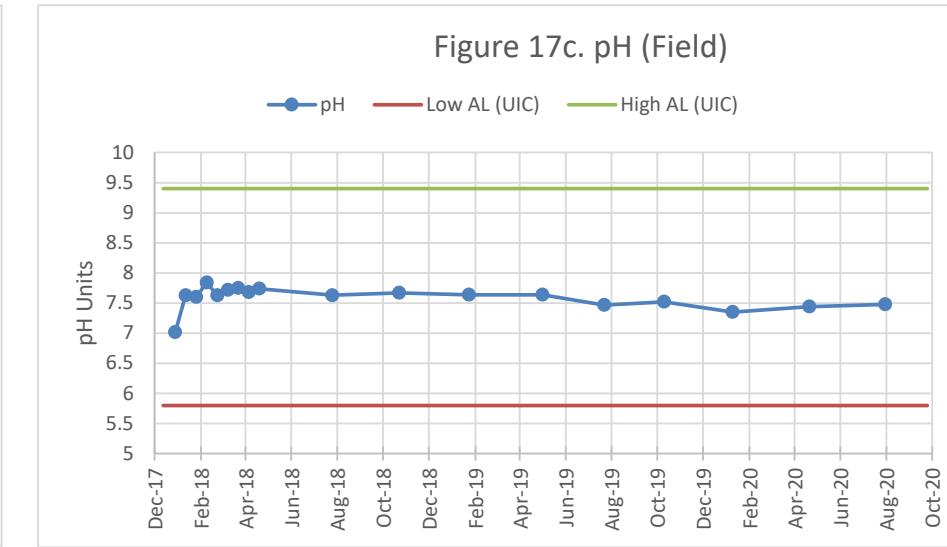
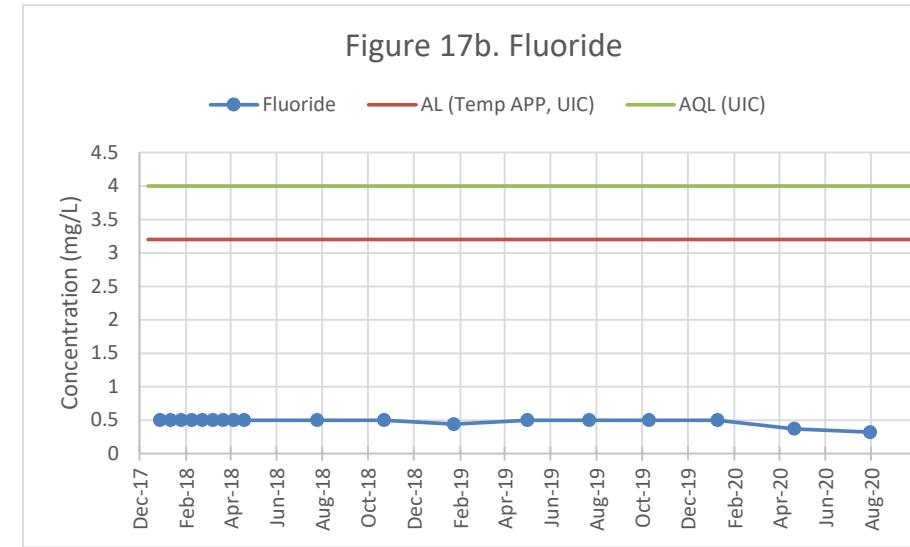
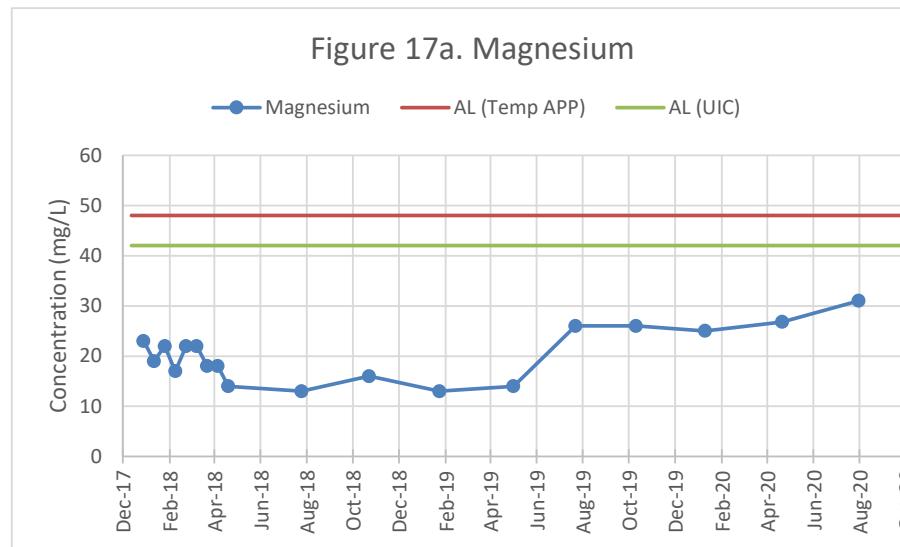
AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

MW-01-O QUARTERLY CONCENTRATION GRAPHS



Notes:

AL = Alert level

APP = Aquifer Protection Permit

AQL = Aquifer Quality Limit

Temp APP = Temporary APP No P-106360

UIC = Underground Injection Control

UIC = UIC Permit No. R9UIC-AZ3-FY11-1

ATTACHMENT 6B

Well Details and Water Level Elevations

Q3 2020 TEMPORARY APP AND

UIC MONITORING WELL DETAILS

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 1. Well Details

Well ID	Well Type	ADWR #	Total Well Depth (ft bgs)	Latitude	Longitude	Screened Interval (ft bgs)	Aquifer Unit
M14-GL	POC	55-549172	838	33°03'4.0"N	111°26'15.77"W	778-838	LBFU
M15-GU	POC	55-547813	594	33°03'4.04"N	111°26'16.40"W	554-594	LBFU
M22-O	POC	55-555831	1,130	33°03'4.53"N	111°26'15.76"W	932-1,130	OXIDE
M23-UBF	POC	55-555824	250	33°03'4.51"N	111°26'16.50"W	210-250	UBFU
M54-LBF	POC	55-226792	629	33°03'7.07"N	111°26'9.29"W	310-629	LBFU
M54-O	POC	55-226798	1,199	33°03'6.91"N	111°26'9.22"W	668-1,199	OXIDE
M52-UBF	POC	55-226788	274	33°03'11.03"N	111°25'24.66"W	200-274	UBFU
M55-UBF	Monitor	55-226797	261	33°03'1.99"N	111°26'6.18"W	240-261	UBFU
M56-LBF	Monitor	55-226795	340	33°03'2.21"N	111°26'6.44"W	320-340	LBFU
M57-O	Monitor	55-226790	1,200	33°03'1.88"N	111°26'8.39"W	523-1,200	OXIDE
M58-O	Monitor	55-226794	1,200	33°03'5.20"N	111°26'4.94"W	594-1,200	OXIDE
M59-O	Monitor	55-226791	1,200	33°03'1.58"N	111°26'2.25"W	534-1,200	OXIDE
M60-O	Monitor	55-226796	1,201	33°02'58.70"N	111°26'5.78"W	444-1,201	OXIDE
M61-LBF	Monitor	55-226799	630	33°03'0.85"N	111°25'58.92"W	429-630	LBFU
MW-01-LBF	Operational	55-226789	440	33°03'02.9442"N	111°26'07.1046"W	330-440	LBFU
MW-01-O	Operational	55-226793	1,200	33°03'03.045"N	111°26'06.9786"W	500-1,200	OXIDE
New Wells Constructed or Replaced							
M57R-O	Monitor	55-229751	1,200	33°03'0.31"N	111°26'8.16"W	550-1,200	OXIDE

Notes:

ADWR = Arizona Department of Water Resources

APP = Aquifer Protection Permit

ft bgs = feet below ground surface

LBFU = lower basin fill unit

POC = point of compliance

UBFU = upper basin fill unit

UIC = Underground Injection Control

SUMMARY OF QUARTERLY WATER LEVELS

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 2. Water Levels

Location ID	Date	Depth to Water (feet)	Description of Measuring Point	Elevation of Measuring Point (feet amsl)	Water Level Elevation (feet amsl)
M14-GL	07/07/2020	NM	TOC	1477.12	NM
M14-GL	08/04/2020	NM	TOC	1477.12	NM
M15-GU	07/07/2020	231.91	TOC	1476.53	1244.62
M15-GU	07/29/2020	232.97	TOC	1476.53	1243.56
M22-O	07/07/2020	235.81	TOM	1478.58	1242.77
M22-O	07/30/2020	NM	TOM	1478.58	NM
M23-UBF	07/07/2020	220.05	TOM	1477.61	1257.56
M23-UBF	07/29/2020	220.01	TOM	1477.61	1257.60
M52-UBF	07/07/2020	230.81	TOC	1485.04	1254.23
M52-UBF	08/05/2020	230.88	TOC	1485.04	1254.16
M54-LBF	07/07/2020	235.70	TOC	1481.92	1246.22
M54-LBF	07/29/2020	236.26	TOC	1481.92	1245.66
M54-O	07/07/2020	242.20	TOC	1482.47	1240.27
M54-O	07/16/2020	236.52	TOC	1482.47	1245.95
M55-UBF	07/07/2020	229.95	TOC	1479.14	1249.19
M55-UBF	07/30/2020	228.70	TOC	1479.14	1250.44
M56-LBF	07/07/2020	234.75	TOC	1478.65	1243.90
M56-LBF	07/30/2020	234.02	TOC	1478.65	1244.63
M57-O	07/07/2020	240.36	TOC +0.87' ¹	1479.58	1239.22
M57-O	08/06/2020	NM	TOC	1478.71	NM
M57R-O	07/07/2020	239.09	TOC	1478.29	1239.20
M57R-O	08/04/2020	241.40	TOC	1478.29	1236.89
M58-O	07/07/2020	241.55	TOC	1482.08	1240.53
M58-O	08/05/2020	242.90	TOC	1482.08	1239.18
M59-O	07/07/2020	242.87	TOC	1480.19	1237.32
M59-O	07/20/2020	235.75	TOC	1480.19	1244.44
M60-O	07/07/2020	237.01	TOC	1477.36	1240.35
M60-O	08/10/2020	238.53	TOC	1477.36	1238.83
M60-O	09/24/2020	233.81	TOC	1477.36	1243.55
M61-LBF	07/07/2020	247.99	TOC	1480.78	1232.79
M61-LBF	08/04/2020	249.10	TOC	1480.78	1231.68
MW-01-LBF	07/07/2020	233.85	TOC	1478.92	1245.07
MW-01-LBF	07/30/2020	233.20	TOC	1478.92	1245.72
MW-01-O	07/07/2020	240.35	TOC	1479.07	1238.72
MW-01-O	07/30/2020	239.05	TOC	1479.07	1240.02
Mine Shaft	07/07/2020	238.83	TOS	1480.40	1241.57
Status of Local Production Wells					
BIA-9R	07/07/2020			Pumping	
BIA-10	07/07/2020			Pumping	
PW2-1	07/07/2020			Not Pumping	
WW-4	07/07/2020			Not Pumping	

Notes:

(1) Measuring point +0.87 foot above TOC

amsl = above mean sea level

NM = not measured

TOC = top of casing

TOM = top of monument

TOS = top of stickup

ATTACHMENT 6C

Groundwater Monitoring Summary

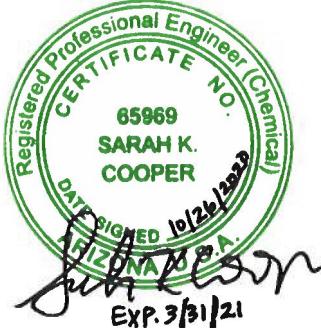
TECHNICAL MEMORANDUM

26 October 2020
File No. 133887-007

TO: Florence Copper Inc.
Brent Berg
General Manager

FROM: Haley & Aldrich, Inc.
Sarah Cooper, P.E.
Technical Specialist
Mark Nicholls, R.G.
Lead Hydrogeologist

SUBJECT: Florence Copper Project
Quarterly Compliance Monitoring Report
Temporary Aquifer Protection Permit (APP) and Underground Injection Control (UIC)
Permit, Third Quarter 2020



Haley & Aldrich, Inc. has prepared this memorandum to present the results of the quarterly compliance groundwater monitoring conducted during the third quarter (Q3) 2020 at the Florence Copper Project. The Florence Copper Project is subject to three related permits issued by the Arizona Department of Environmental Quality (ADEQ) and the U.S. Environmental Protection Agency (USEPA).

APP Covering the 1997-98 BHP Pilot Facilities and Future Operations (Sitewide APP):

- ADEQ APP No. P-101704 (LTF 65804) dated 13 October 2017.

Permits Covering the Current Production Test Facility:

- ADEQ Temporary APP No. P-106360 (LTF 80030) dated 13 February 2020 (Temporary APP), and
- USEPA UIC Permit No. R9UIC-AZ3-FY11-1 dated 20 December 2016.

This report presents the results of the Q3 2020 groundwater monitoring activities required by the Temporary APP and UIC permit.

Sampling Activities

During Q3 2020, monitoring was conducted at 16 point-of-compliance, monitoring, and supplemental wells, and one replacement well (M57R-O) not yet incorporated into the Temporary APP or UIC permit. Water levels were collected on 7 July 2020, and quarterly groundwater sampling was conducted between 8 July and 24 September 2020. Groundwater sampling and analysis was conducted in accordance with the requirements of Sections 2.5.3 and 2.5.8 of the Temporary APP and Part II.F of the UIC permit.

The majority of the monitoring wells are equipped with low-flow bladder pumps. Low-flow sampling was conducted in accordance with Section 2.5.3 of the Temporary APP. Wells M14-GL, M22-O, and M57-O were equipped with stainless steel electric submersible pumps and were sampled by purging a minimum of three borehole volumes. No modified sampling procedures were used.

Each sample was labeled, placed in a cooler with ice, maintained at 4 degrees Celsius ($^{\circ}\text{C}$) $\pm 2^{\circ}\text{C}$, and transported under chain of custody to Pace Analytical (Pace) for analysis. Samples were analyzed for the quarterly (Level 1) monitoring parameters listed in Table 4.1-6 of the Temporary APP and Table 1 of the UIC permit.

Samples collected from well M60-O were analyzed for the Level 1 monitoring parameters as well as gross alpha, uranium activity, and adjusted gross alpha due to the previously confirmed exceedance of the gross alpha Temporary APP AL. Sample containers collected for radiological parameter analysis were labelled and transported under chain of custody directly to Radiation Safety Engineering, Inc. who performed the analyses as a subcontractor to the primary laboratory.

Results

The results of the Q3 2020 monitoring event are presented in Tables 1 through 3 as follows:

- Table 1 – Q3 2020 Field Parameters;¹
- Table 2 – Q3 2020 Quarterly (Level 1) Analytical Parameters; and
- Table 3 – M60-O Monitoring Summary.

The Q3 2020 results were compared to the ALs and Aquifer Quality Limits (AQLs) listed in the applicable tables in Section 4.0 of the Temporary APP, Appendix K of the UIC permit, and Table 4B of the document submitted to the USEPA dated 12 December 2018 and entitled *Procedures for Determining Alert Levels and Aquifer Quality Limits for Groundwater Compliance Monitoring*. The Q3 2020 results for replacement well M57R-O were compared to the proposed ALs and AQLs submitted by Florence Copper Inc. (Florence Copper) to ADEQ and USEPA in the letter entitled *Proposed Alert Levels and Aquifer Quality Limits for Replacement Supplemental Monitoring Well M57R-O* and dated 25 March 2020.

¹ Note that turbidity was monitored as a field parameter in addition to field pH, temperature, and specific conductance, but is not required by the Temporary APP or UIC permit and is therefore not reported.

No confirmed AQL exceedances occurred in Q3 2020. The Temporary APP AL for gross alpha was exceeded in well M60-O during Q3 2020.

A potential exceedance of the UIC AL and AQL and the Temporary APP AL for adjusted gross alpha occurred in Q3 2020 at well M60-O. Contingency sampling plan procedures consistent with Part II.H.2 of the UIC Permit and Section 2.6.2.4 of the Temporary APP were implemented in Q3 2020 to address the potential exceedances in M60-O. Verification sample results are pending. See below for further discussion regarding M60-O sampling results.

A quality assurance/quality control summary of the Q3 2020 data is provided in Appendix A.

M60-O

The first occurrence of a Temporary APP gross alpha AL exceedance in well M60-O occurred in Q4 2019. Florence Copper elected to initiate monthly monitoring of M60-O for gross alpha, uranium activity, and adjusted gross alpha following the confirmed exceedance. Monthly monitoring of M60-O was conducted from January 2020 through June 2020. During that time, gross alpha activity ranged from 36.4 ± 1.4 pCi/L to 47.8 ± 2.3 pCi/L, above the Temporary APP AL of 15 pCi/L. Adjusted gross alpha concentrations for each of the sampling events, however, were below the applicable AL and AQL. Adjusted gross alpha is calculated only if the gross alpha result exceeds 12 pCi/L. A verification sample is not required for gross alpha if the adjusted gross alpha results are below the AL.

During Q3 2020, M60-O was sampled on 10 August 2020. Florence Copper was notified on 31 August 2020 that the sample's gross alpha result of 34.6 ± 1.9 pCi/L continued to exceed the Temporary APP AL. All other parameters, including adjusted gross alpha, were below their respective ALs. Florence Copper notified ADEQ of the sampling event results on 4 September 2020 (INC11616).

Because the status of INC11616 was set to "under review" rather than "resolved," Florence Copper collected a monthly sample from M60-O on 24 September 2020. On 5 October 2020, Florence Copper was notified that the gross alpha result of 54.6 ± 1.8 pCi/L continued to exceed the Temporary APP AL. In addition, three new potential exceedances all pertaining to adjusted gross alpha were identified. Adjusted gross alpha in the 24 September 2020 sample was reported at 29.9 ± 3.8 pCi/L, above the UIC AL and AQL of 17.4 pCi/L and the Temporary APP AL of 26.5 pCi/L.

In accordance with the requirements of Section 2.6.2.4.1 of the Temporary APP, Florence Copper requested laboratory confirmation of the 24 September 2020 gross alpha activity results on 8 October 2020. The laboratory confirmed the initial result accuracy on 12 October 2020. A verification (and quarterly Q4 2020) sample was collected from M60-O on 8 October 2020 in accordance with the requirements of the Temporary APP Section 2.6.2.4 and Part II.H.2 of the UIC Permit. The results of the 8 October 2020 sample are currently pending. On 9 October 2020, Florence Copper notified ADEQ of the continued exceedance of the gross alpha AL (INC11706) and the potential exceedance of the adjusted gross alpha AL (INC11707).

Florence Copper Inc.

26 October 2020

Page 4

Enclosures:

Table 1 – Q3 2020 Field Parameters

Table 2 – Q3 2020 Quarterly (Level 1) Analytical Parameters

Table 3 – M60-O Monitoring Summary

Appendix A – Data Quality Assurance/Quality Control Summary Memorandum

TABLES

TABLE 1
Q3 2020 FIELD PARAMETERS
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Location	Sample Date	Temperature, Field Deg C	Temperature, Field Deg F	pH, Field pH units	pH Low UIC Alert Level pH units	pH High UIC Alert Level pH units	Specific Conductance, Field μmhos/cm
M14-GL	08/04/2020	27.3	81.1	8.24	NE	NE	794
M15-GU	07/29/2020	25.4	77.7	7.26	NE	NE	1,365
M22-O	07/30/2020	28.6	83.5	8.22	NE	NE	750
M23-UBF	07/29/2020	23.3	73.9	6.42	NE	NE	1,921
M52-UBF	08/05/2020	25.5	77.9	7.02	6.9	7.9	1,449
M54-LBF	07/29/2020	25.2	77.4	7.07	6.5	8.2	1,495
M54-O	07/16/2020	26.6	79.9	7.58	6.8	9.4	822
M55-UBF	07/30/2020	25.3	77.5	7.02	6.6	7.8	1,678
M56-LBF	07/30/2020	24.3	75.7	7.15	6.5	8.3	1,502
M57-O	08/06/2020	26.5	79.7	7.76	7.2	8.5	869
M57R-O	08/04/2020	25.1	77.2	7.52	7.2	8.5	1,107
M58-O	08/05/2020	26.8	80.2	7.41	6.2	9.0	1,661
M59-O	07/20/2020	27.1	80.8	7.90	7.0	8.7	851
M60-O	08/10/2020	25.9	78.6	7.15	6.3	9.0	1,540
M60-O	09/24/2020	26.8	80.2	7.32	6.3	9.0	926
M61-LBF	08/04/2020	26.7	80.1	7.64	6.8	9.4	758
MW-01-LBF	07/30/2020	27.3	81.1	7.14	6.2	8.5	1,473
MW-01-O	07/30/2020	24.5	76.1	7.48	5.8	9.4	1,497

Abbreviations:

μmhos/cm = micromhos per centimeter

Deg C = degrees Celsius

Deg F = degrees Fahrenheit

UIC = Underground Injection Control

NE = not established

TABLE 2**Q3 2020 QUARTERLY (LEVEL 1) ANALYTICAL PARAMETERS**

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Location ID	Sample Date	Sample Type	Magnesium, Dissolved			Sulfate			Fluoride					Total Dissolved Solids (TDS)		
			Concentration	TEMP APP Alert Level	UIC Alert Level	Concentration	TEMP APP Alert Level	UIC Alert Level	Concentration	TEMP APP Alert Level	TEMP APP AQL	UIC Alert Level	UIC AQL	Concentration	TEMP APP Alert Level	UIC Alert Level
M14-GL	08/04/2020	Primary	2.1	23	23	52.7	144	144	0.49	3.2	4.0	3.2	4.0	426	874	874
M14-GL	08/04/2020	Duplicate	2.0	23	23	53.1	144	144	0.51	3.2	4.0	3.2	4.0	415	874	874
M15-GU	07/29/2020	Primary	26.4	44	44	71.4	126	126	0.38	3.2	4.0	3.2	4.0	846	1359	1359
M22-O	07/30/2020	Primary	6.7	8.6	8.6	46.4	86	86	0.41	3.2	4.0	3.2	4.0	408	1094	1094
M23-UBF	07/29/2020	Primary	32.3	69	69	198	411	411	0.66	3.2	4.0	3.2	4.0	1,210	2392	2392
M52-UBF	08/05/2020	Primary	27.1	45	41	134	351	316	0.65	3.2	4.0	3.2	4.0	830	1666	1502
M52-UBF	08/05/2020	Duplicate	25.7	45	41	138	351	316	0.68	3.2	4.0	3.2	4.0	860	1666	1502
M54-LBF	07/29/2020	Primary	22.7	46	42	129	329	297	0.63	3.2	4.0	3.2	4.0	924	1731	1561
M54-LBF	07/29/2020	Duplicate	23.9	46	42	131	329	297	0.68	3.2	4.0	3.2	4.0	855	1731	1561
M54-O	07/16/2020	Primary	5.9	11	10	51.8	200	200	0.72	3.2	4.0	3.2	4.0	411	855	771
M55-UBF	07/30/2020	Primary	31.3	50	45	173	484	425	0.55	3.2	--	3.2	4.0	1,010	1900	1711
M56-LBF	07/30/2020	Primary	28.4	46	41	127	312	281	0.16	3.2	--	3.2	4.0	885	1646	1485
M56-LBF	07/30/2020	Duplicate	26.5	46	41	124	312	281	0.18	3.2	--	3.2	4.0	922	1646	1485
M57-O	08/06/2020	Primary	12.3	20	18	55.1	200	200	0.34 J	3.2	--	3.2	4.0	522	934	842
M57R-O	08/04/2020	Primary	15.5	36	35	181	224	230	0.48	3.2	--	3.2	4.0	678	1079	1113
M58-O	08/05/2020	Primary	27.1	59	51	164	435	385	0.49	3.2	--	3.2	4.0	1,060	1716	1539
M59-O	07/20/2020	Primary	10.8	27	23	67.8	234	202	0.62	3.2	--	3.2	4.0	464	947	854
M60-O	08/10/2020	Primary	28.5	54	45	175	313	271	0.22	3.2	--	3.2	4.0	865	1492	1314
M60-O ⁽²⁾	09/24/2020	Primary	27.0	54	45	172	313	271	0.19	3.2	--	3.2	4.0	880	1492	1314
M61-LBF	08/04/2020	Primary	7.6	13	12	49.0	200	200	0.54	3.2	--	3.2	4.0	426	852	769
MW-01-LBF	07/30/2020	Primary	29.1	47	43	142	340	307	0.23	3.2	--	3.2	4.0	914	1711	1543
MW-01-O	07/30/2020	Primary	31.0	48	42	216	254	229	0.32	3.2	--	3.2	4.0	895	1563	1409
Arizona Aquifer Water Quality Standard ⁽¹⁾			--	--	--	--	--	--	4.0					--	--	--

Notes:

(1) Arizona Aquifer Water Quality Standard (AWQS), Drinking Water Standard, December 31, 2016.

(2) Verification sampling conducted on 9/24/2020.

All results in milligrams per liter (mg/L)

Detects are **bolded**.

Non-detects are reported to the laboratory method detection limit (< MDL).

AQL = Aquifer Quality Limit

J = estimated value

Temp APP = Temporary Aquifer Protection Permit No. 106360

UIC = Underground Injection Control Permit No. R9UIC-AZ3-FY11-1

TABLE 3**Q3 2020 WELL M60-O MONITORING SUMMARY**

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Parameter	Units	TEMP APP Alert Level	UIC Alert Level	UIC AQL	M60-O-010820	M60-O-020720
					08/10/2020	09/24/2020
					Primary	Primary
Level 1 Parameters						
Magnesium, Dissolved	mg/L	54	45	--	28.5	27.0
Sulfate	mg/L	313	271	--	175	172
Fluoride	mg/L	3.2	3.2	4	0.22	0.19
Total Dissolved Solids (TDS)	mg/L	1492	1314	--	865	880
Inorganic Parameters						
pH, Lab	pH units	--	--	--	7.5	7.6
Conductivity, Lab	µmhos/cm	--	--	--	1,580	1,620
Radionuclide Parameters						
Gross Alpha Analytes	pCi/L	15	--	--	34.6 ± 1.9	54.6 ± 1.8
Gross Alpha Analytes Adjusted	pCi/L	26.5	17.4	17.4	< 1.0	29.9 ± 3.8
Total Uranium	pCi/L	--	--	--	36.0 ± 4.1	24.7 ± 3.4

Notes:Detects are **bolded**.

Alert Level and/or Aquifer Quality Limit Exceedance

Non-detects are reported to the laboratory method detection limit (< MDL).

µmhos/cm = micromhos per centimeter

AL = Alert Level

AQL = Aquifer Quality Limit

mg/L = milligrams per liter

pCi/L = picocuries per liter

Temp APP = Temporary Aquifer Protection Permit No. 106360

UIC = Underground Injection Permit No. R9UIC-AZ3-FY11-1

APPENDIX A

Data Quality Assurance/Quality Control Summary Memorandum



HALEY & ALDRICH, INC.
One Arizona Center
400 E. Van Buren St., Suite 545
Phoenix, AZ 85004
602.760.2450

MEMORANDUM

12 October 2020
File No. 133887-007

TO: Haley & Aldrich, Inc.
Sarah Cooper, P.E.

FROM: Haley & Aldrich, Inc.
Alexis Rainery, Engineer
Katherine Miller, Project Manager

SUBJECT: Appendix A – Data Quality Assurance/Quality Control Summary

Analytical results for environmental samples collected during the third 2020 compliance monitoring event were verified in accordance with guidance provided by the U.S. Environmental Protection Agency [USEPA], 2012]¹. For each laboratory data package, the following quality control/quality assurance criteria from the analysis of the project samples were reviewed:

- Completeness with the chain of custody (COC);
- Comparison of reporting limits to alert levels (AL) and aquifer quality limits (AQL);
- Holding times/preservation;
- Blank sample analysis;
- Laboratory control samples;
- Matrix spike samples;
- Laboratory and field duplicate sample analysis; and
- Verification of laboratory report data.

Sample data was qualified by the laboratory in accordance with laboratory standard operating procedures (SOP). Based on a check of the data qualifiers assigned to the project sample results, these flags were applied to the reported results in accordance with the laboratory-specific SOP.

COMPLETENESS WITH CHAIN OF CUSTODY

Samples were collected, preserved, and shipped following standard COC protocol. Samples were also received appropriately, identified correctly, and analyzed according to the COC. COCs were

¹ USEPA, 2012. USEPA Region 9 Guidance for Quality Assurance Program Plans, R9QA/03.2. March.

appropriately signed and dated by the field and/or laboratory personnel. The following exceptions were noted:

- Custody seal not used on coolers for the following laboratory reports: 10526748, 10526949, 10527299, 10527734, and 10533287. The following samples are included in the identified laboratory reports: M54-LBF-072920, M99-072920, M56-LBF-073020, M100-073020, MW-01-O-073020, MW-01-LBF-073020, M55-UBF-073020, M55-UBF-073020, M61-LBF-080420, M57-R-O-080420, M101-080420, M57-O-080620, and M60-0-092420.

REPORTING LIMITS

The reporting limits and/or method detection limits were at or below the applicable ALs and AQLs.

HOLDING TIMES/PRESERVATION

The samples arrived at the laboratory at the proper temperature and were prepared and analyzed within the holding time and preservation criteria specified as per each method's protocol with the following exceptions:

- All samples analyzed for pH by method SM 4500-H+B were analyzed outside the hold time by the laboratory per client request.

Laboratory Report	Method	Matrix	Holding Time	Preservation	Sample ID, Violation, Qualification
10525317	All	Water	Various	Cool to ≤ 6 °C	The cooler containing the following samples was received warm at 6.7 degrees Celsius (°C): M54-O-071620
10526748	SM2540C	Water	7 days	Cool to ≤ 6 °C	Total dissolved solids by method SM2540C were analyzed and reported outside the 7 day hold time for the following samples due to initial analysis quality control failure: M54-LBF-072920, M99-072920, M15-GU-072920 The out-of-hold reanalysis results confirmed the original in-hold analysis.
10526949	SM2540C	Water	7 days	Cool to ≤ 6 °C	Total dissolved solids by method SM2540C was analyzed outside the 7-day hold time for the following samples: M56-LBF-073020, M100-073020, MW-01-O-073020 MW-01-LBF-073020, M55-UBF-073020
Notes: °C = degrees Celsius SM = Standard Method USEPA = U.S. Environmental Protection Agency					

BLANK SAMPLE ANALYSIS

Method blank samples had no detections, indicating that no contamination from laboratory activities occurred with the following exceptions:

Laboratory Report	Sample ID	Batch ID	Analyte Detected in Method Blank	Concentration (mg/L)
10525317	M54-O-071620	688247	Magnesium, Dissolved	0.0081 J
10525556	M59-O-072020	688247	Magnesium, Dissolved	0.0081 J
10526748	M54-LBF-072920 M99-072920 M15-GU-072920	690758	Sulfate	0.69 J
10527450	M58-O-080520 M52-UBF-080520 M102-080520	692060	Total Dissolved Solids	5.0 J
10527857	M60-O-081020	692476	Fluoride	0.019 J
Notes:				
<i>µmhos/cm = micromhos per centimeter</i>				
<i>J = estimated</i>				
<i>mg/L = milligrams per liter</i>				

LABORATORY CONTROL AND MATRIX SPIKE SAMPLES

Compounds associated with the laboratory control sample and laboratory control sample duplicate and matrix spike and matrix spike duplicate analyses exhibited recoveries and relative percent differences (RPD) within the specified limits with the following exceptions:

Laboratory Report	Sample ID	Sample Type	Method	Batch ID	Analyte	%R, RPD	Acceptable %R, RPD
10526949	M22-O-073020	MS/MSD	USEPA 300	690760	Fluoride	57%/60%	80-120%
	M56-LBF-073020	MS/MSD	USEPA 300	691445	Fluoride	56%/63%	80-120%
	M100-073020	MS/MSD	USEPA 300	691445	Fluoride	51%/58%	80-120%
10527734	M57-O-080620	MS/MSD	USEPA 300	691729	Fluoride	35%/45%	80-120%
	M4-O-086020	MS/MSD	USEPA 300	691729	Fluoride	50%/62%	80-120%
10527857	M60-O-081020	MS/MSD	USEPA 300	692476	Fluoride	47%/57%	80-120%
10533287	M60-O-092420	MSD	USEPA 200.8	700935	Magnesium, dissolved	147%	70-130%
Notes:							
<i>% = percent</i>							
<i>%R = percent recovery</i>							
<i>MS = matrix spike</i>							
<i>MSD = matrix spike duplicate</i>							
<i>RPD = relative percent difference</i>							
<i>USEPA = U.S. Environmental Protection Agency</i>							

LABORATORY AND FIELD DUPLICATE SAMPLES

The RPDs for laboratory duplicate analysis were all below 20 percent for water (or the absolute difference rule was satisfied if detects were less than 5 times the reporting limit).

The field duplicate sample analysis is used to assess the precision of the field sampling procedures and analytical method. The following samples were collected for field duplicate analysis and the RPDs were all below 35% for water (or the absolute difference rule was satisfied if detects were less than 5x the RL).

Primary Sample ID	Duplicate Sample ID	Method(s)
M54-LBF-072920	M99-072920	Magnesium, dissolved by USEPA 200.8 Sulfate and Fluoride by USEPA 300 Specific Conductance by SM 2510 Total Dissolved Solids by SM 2540C pH by SM 4500H+B
M56-LBF-073020	M100-073020	
M14-GL-080420	M101-080420	
M52-UBF-080520	M103-080520	

VERIFICATION OF LABORATORY REPORT DATA

A minimum of 10 percent of the data reported by the laboratory was verified against the electronic data deliverables.

ATTACHMENT 7

Results of Monthly Lixiviant Organic Analysis

TABLE 1**MONTHLY LIXIVIANT (RAFFINATE) MONITORING RESULTS**

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Analyte	Units	Sample Date		
		7/23/2020	8/20/2020	9/21/2020
Benzene	mg/L	<0.0005	<0.0005	<0.0005
Ethylbenzene	mg/L	<0.0005	<0.0005	<0.0005
Naphthalene	mg/L	<0.002	<0.002	<0.002
n-Octane	mg/L	<0.0005	<0.0005	<0.0005
Toluene	mg/L	<0.0005	<0.0005	<0.0005
Xylenes, Total	mg/L	<0.0015	<0.0015	<0.0015
TPH-Diesel	mg/L	0.99	0.71	1
Total Organics	mg/L	0.99	0.71	1
Maximum Allowable Average Total Organics	mg/L	10	10	10

Notes:

mg/L = milligrams per liter

TPH = total petroleum hydrocarbons

ATTACHMENT 8

Results of Mechanical Integrity Testing

Q3 2020 MECHANICAL INTEGRITY TESTS

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Q3 2020 Mechanical Integrity Tests			
Well ID	Temperature Log Date	Pressure Test Date	Pass (P) Fail (F)
WB-01	9/3/2020	--	P
WB-02	9/3/2020	--	P
WB-03	9/3/2020	--	P
WB-04	9/3/2020	--	P

Notes:*Temperature log report sent to the United States Environmental Protection Agency under separate cover.*

ATTACHMENT 9

Results of Annular Conductivity Device Monitoring



ANNULAR CONDUCTIVITY DATA QA PROCEDURE & DOCUMENTATION FORM (V.1)

GENERAL

HGI Project Name: 2018-030 – FCP Bulk & Annular Conductivity Monitoring	Project Site: Florence Copper Project	Weather Conditions: 96°F, Mostly Cloudy, humid
Date <i>2 July 2020</i>	Field Operator Name: <i>L. Salgado</i>	Start and End Time: <i>1100 – 1245</i>

EQUIPMENT

AGI MiniSting (MS) Serial #: S0608049	DIAGNOSTICS			MEASUREMENT SETTINGS		
	(See back of sheet for detailed instructions and procedures)					
HGI Cray Interface Panel SN# CR-ES-002	6Ω Resistor Standard Result: <i>6.392</i>	Pass Criteria: $6.25\Omega \pm 0.30$	Circle One: <i>Pass or Fail</i>	• No. Cycles: 4	• Max Error: Off	• Max Current: <i>20.50mA</i>

DATA COLLECTION:

WELL ID	Time (24h)	Current (1 mA)	1			2			3			Data Acceptance Pass = P, Fail = F
			Reading	Resistance ($\Delta Y = \Omega$)	Error ($\sigma = \%$)	Reading	Resistance ($\Delta Y = \Omega$)	Error ($\sigma = \%$)	Reading	Resistance ($\Delta Y = \Omega$)	Error ($\sigma = \%$)	
1 WB-04	1156	20	19	62.47	2.1	20	62.85	2.8	21	62.99	2.7	P/F
2 WB-03	1202	20	82	76.66	0.6	23	76.13	1.7	24	76.19	1.9	P/F
3 WB-02	1209	20	25	80.48	2.4	26	81.09	2.3	27	80.83	2.4	P/F
4 WB-01	1214	20	28	52.26	1.3	29	50.46	1.2	30	49.90	1.4	P/F
5 B-07	1235	20	40	67.61	0.6	41	66.65	0.9	42	66.39	0.9	P/F
6 B-07	1137	20	10	59.82	0.7	11	59.04	0.9	12	58.58	1.0	P/F
7 B-05	1143	20	13	58.48	0.9	14	56.83	1.1	15	56.21	1.4	P/F
8 B-05	1150	20	16	86.58	0.3	17	85.67	0.4	18	85.25	0.5	P/F
9 B-04	1219	20	31	56.10	1.5	32	54.3	0.7	33	53.77	0.8	P/F
10 B-03	1224	20	34	53.68	0.8	35	52.3	0.7	36	51.82	0.6	P/F
11 B-02	1232	20	37	65.22	1.7	38	65.25	1.8	39	64.93	1.8	P/F

DATA QUALITY ACCEPTANCE

Measurement Error Evaluation
Pass Criteria: 66% (2/3) of measurement error values less than 5%

(Briefly describe site activities at time of data acquisition, status of electrode arrays, or other parameters that may influence readings)

FIELD OBSERVATIONS

No activities on site during collection.

SIGNATURES

By signing, I certify that data collection instrumentation pass all required tests and the data collection process followed all required setup and programming instructions listed within this procedure.

02 July 2020
Field Operator Signature/Date

By signing, I certify that instrumented data pass all required data quality tests listed within this procedure.

02 July 2020
Data Inspector Signature/Date

ATTACHMENT 10

Table of Monthly Casing Annulus and Injection Pressures

Q3 2020 DAILY WELLHEAD PRESSURES - INJECTION WELLS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 1. July 2020 Daily Wellhead Pressures - Injection Wells

Date	I-01			I-02			I-03			I-04			Fracture Gradient
	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	
7/1/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	45.65	43.92	49.19	112.89
7/2/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	47.45	45.26	49.42	112.89
7/3/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	47.50	33.66	51.74	112.89
7/4/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	48.58	18.35	51.86	112.89
7/5/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.09	50.78	13.47	53.99	112.89
7/6/2020	0.00	0.00	0.00	42.34	0.00	53.27	0.00	0.00	0.00	80.59	52.20	84.52	112.89
7/7/2020	0.00	0.00	0.00	12.24	0.00	42.44	0.00	0.00	0.00	59.13	46.80	84.30	112.89
7/8/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	52.70	49.87	54.14	112.89
7/9/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	55.68	53.73	57.48	112.89
7/10/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	58.17	56.80	62.89	112.89
7/11/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	59.43	0.00	62.75	112.89
7/12/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	61.32	60.03	62.71	112.89
7/13/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	63.23	61.32	64.37	112.89
7/14/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	63.80	62.59	65.62	112.89
7/15/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	64.29	63.17	65.55	112.89
7/16/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	64.71	62.97	66.50	112.89
7/17/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	64.93	63.43	66.08	112.89
7/18/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65.56	63.78	68.98	112.89
7/19/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65.62	64.06	67.28	112.89
7/20/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	66.54	64.96	68.12	112.89
7/21/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	68.93	67.99	71.69	112.89
7/22/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	68.43	65.57	70.81	112.89
7/23/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	34.56	15.20	69.52	112.89
7/24/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.56	19.46	21.62	112.89
7/25/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.72	20.87	23.00	112.89
7/26/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22.12	21.08	23.44	112.89
7/27/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22.45	21.16	24.14	112.89
7/28/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.79	19.52	24.01	112.89
7/29/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.72	22.43	24.55	112.89
7/30/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.43	22.76	25.71	112.89
7/31/2020	0.00	0.00	0.37	0.00	0.00	0.00	0.00	0.00	0.01	23.96	0.00	31.59	112.89

Notes:

All measurements in pounds per square inch (psi)

I-04 injection focused on the lower zones, resulting in an increase in pressure

Calculation of Pressure Allowed at the Wellhead from the Allowed Fracture Gradient

P-Wellhead = P-TOS - P-Col = [P-Frac x D-TOS] - [D-TOS / Conv] Where:

P-Fracture	= Pressure allowed at the top of the injection well screen (TOS)	=	0.65	psi/foot of depth
D-TOS	= Depth to top of injection well screens	=	520	feet
P-TOS	= Total pressure allowed at top of screen = P-Fracture x D-TOS	=	0.65 psi/foot x 520 feet	338 psi
Conv	= Feet of Water per psi	=	2.31	feet/psi
P-Col	= Pressure from weight of water column at TOS	=	520 feet / 2.31 feet/psi	225.11 psi
P-Wellhead	= Allowable pressure at the top of the wellhead = P-TOS - P-Col	=	338 psi - 255.1 psi	112.89 psi

Q3 2020 DAILY WELLHEAD PRESSURES - INJECTION WELLS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 2. August 2020 Daily Wellhead Pressures - Injection Wells

Date	I-01			I-02			I-03			I-04			Fracture Gradient
	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	
8/1/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	25.97	24.40	28.43	112.89
8/2/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26.34	21.73	40.67	112.89
8/3/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.40	19.15	26.99	112.89
8/4/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.00	17.36	24.93	112.89
8/5/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22.13	20.11	23.94	112.89
8/6/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.77	20.82	24.55	112.89
8/7/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22.32	20.94	23.53	112.89
8/8/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.45	20.10	23.04	112.89
8/9/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.02	20.02	22.36	112.89
8/10/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.96	19.88	22.31	112.89
8/11/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.75	19.18	22.08	112.89
8/12/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.87	19.68	21.89	112.89
8/13/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.95	20.37	24.25	112.89
8/14/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.35	18.61	23.03	112.89
8/15/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.81	18.59	21.06	112.89
8/16/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.32	0.00	19.99	112.89
8/17/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.62	17.81	19.46	112.89
8/18/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.27	17.85	20.47	112.89
8/19/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.72	17.79	20.97	112.89
8/20/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.50	18.23	20.66	112.89
8/21/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.86	17.92	20.32	112.89
8/22/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.24	18.35	20.14	112.89
8/23/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.25	19.65	21.97	112.89
8/24/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.75	18.81	21.05	112.89
8/25/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.19	17.25	22.09	112.89
8/26/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.95	18.77	22.41	112.89
8/27/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.85	17.67	21.51	112.89
8/28/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.16	18.16	21.36	112.89
8/29/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.23	17.39	20.14	112.89
8/30/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.80	0.00	20.45	112.89
8/31/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.29	17.69	20.41	112.89

Notes:

All measurements in pounds per square inch (psi)

I-04 injection focused on the lower zones, resulting in an increase in pressure

Calculation of Pressure Allowed at the Wellhead from the Allowed Fracture Gradient

$$P\text{-Wellhead} = P\text{-TOS} - P\text{-Col} = [P\text{-Frac} \times D\text{-TOS}] - [D\text{-TOS} / Conv] \text{ Where:}$$

P-Fracture	= Pressure allowed at the top of the injection well screen (TOS)	=	0.65	psi/foot of depth
D-TOS	= Depth to top of injection well screens	=	520	feet
P-TOS	= Total pressure allowed at top of screen = P-Fracture x D-TOS	= 0.65 psi/foot x 520 feet	338	psi
Conv	= Feet of Water per psi	=	2.31	feet/psi
P-Col	= Pressure from weight of water column at TOS	= 520 feet / 2.31 feet/psi	225.11	psi
P-Wellhead	= Allowable pressure at the top of the wellhead = P-TOS - P-Col	= 338 psi - 255.1 psi	112.89	psi

Q3 2020 DAILY WELLHEAD PRESSURES - INJECTION WELLS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 3. September 2020 Daily Wellhead Pressures - Injection Wells

Date	I-01			I-02			I-03			I-04			Fracture Gradient
	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	
9/1/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.05	17.92	19.92	112.89
9/2/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.75	16.55	20.24	112.89
9/3/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.31	15.94	19.71	112.89
9/4/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.31	16.44	19.71	112.89
9/5/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.69	0.00	19.98	112.89
9/6/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.51	18.81	24.05	112.89
9/7/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.59	22.85	25.23	112.89
9/8/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.63	22.30	25.69	112.89
9/9/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.56	22.70	24.85	112.89
9/10/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.77	20.44	29.27	112.89
9/11/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.25	25.58	29.57	112.89
9/12/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26.52	25.40	27.76	112.89
9/13/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27.40	26.45	28.06	112.89
9/14/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.06	26.81	29.44	112.89
9/15/2020	1.03	0.00	33.99	0.00	0.00	0.00	0.00	0.00	0.00	25.64	19.16	68.49	112.89
9/16/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.02	21.24	24.75	112.89
9/17/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.67	21.84	25.04	112.89
9/18/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.80	22.73	24.77	112.89
9/19/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.17	22.91	25.32	112.89
9/20/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.02	22.58	25.42	112.89
9/21/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26.12	23.72	28.22	112.89
9/22/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.12	25.35	29.61	112.89
9/23/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.87	21.81	81.70	112.89
9/24/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	25.48	24.14	26.12	112.89
9/25/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.34	21.23	26.26	112.89
9/26/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.94	19.92	23.19	112.89
9/27/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.65	0.00	22.97	112.89
9/28/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22.52	20.38	24.21	112.89
9/29/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.54	0.00	22.35	112.89
9/30/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.56	17.40	20.74	112.89

Notes:

All measurements in pounds per square inch (psi)

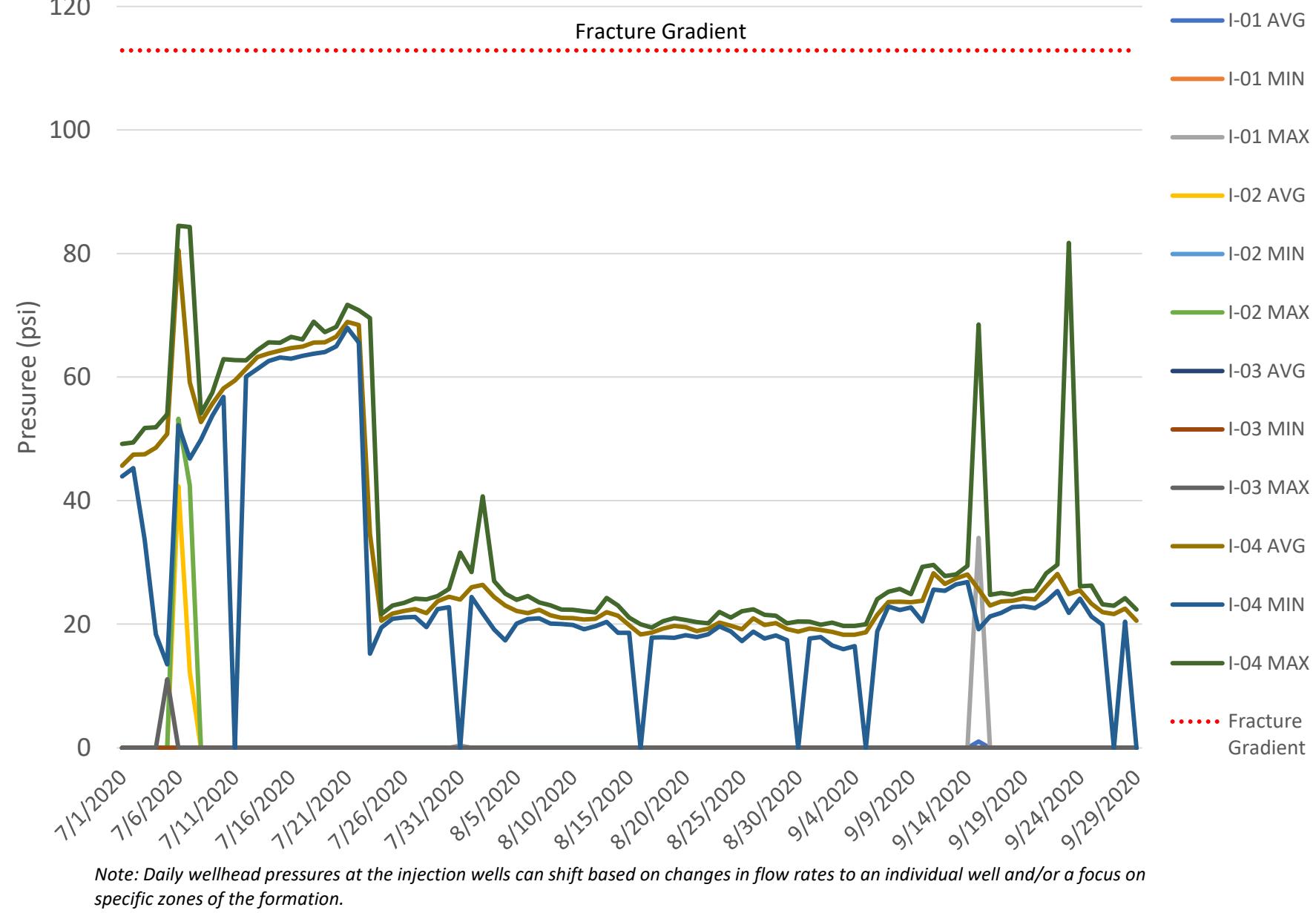
I-04 injection focused on the lower zones, resulting in an increase in pressure

Calculation of Pressure Allowed at the Wellhead from the Allowed Fracture Gradient

P-Wellhead = P-TOS - P-Col = [P-Frac x D-TOS] - [D-TOS / Conv] Where:

P-Fracture	= Pressure allowed at the top of the injection well screen (TOS)	=	0.65	psi/foot of depth
D-TOS	= Depth to top of injection well screens	=	520	feet
P-TOS	= Total pressure allowed at top of screen = P-Fracture x D-TOS	=	0.65 psi/foot x 520 feet	338 psi
Conv	= Feet of Water per psi	=	2.31	feet/psi
P-Col	= Pressure from weight of water column at TOS	=	520 feet / 2.31 feet/psi	225.11 psi
P-Wellhead	= Allowable pressure at the top of the wellhead = P-TOS - P-Col	=	338 psi - 255.1 psi	112.89 psi

Figure 1. Daily Wellhead Pressures - Injection Wells



Q3 2020 DAILY CASING ANNULUS PRESSURES - INJECTON WELLS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 4. July 2020 Daily Casing Annulus Pressures - Injection Wells

Date	I-01			I-02			I-03			I-04			Fracture Gradient
	Avg	Min	Max										
7/1/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/2/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/3/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/4/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/5/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/6/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/7/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/8/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/9/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/10/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/11/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/12/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/13/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/14/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/15/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/16/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/17/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/18/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/19/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/20/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/21/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/22/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/23/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/24/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/25/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/26/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/27/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/28/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/29/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/30/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
7/31/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89

Notes:

All measurements in pounds per square inch (psi)

Q3 2020 DAILY CASING ANNULUS PRESSURES - INJECTON WELLS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

Table 5. August 2020 Daily Casing Annulus Pressures - Injection Wells

Date	I-01			I-02			I-03			I-04			Fracture Gradient
	Avg	Min	Max										
8/1/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/2/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/3/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/4/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/5/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/6/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/7/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/8/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/9/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/10/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/11/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/12/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/13/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/14/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/15/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/16/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/17/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/18/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/19/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/20/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/21/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/22/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/23/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/24/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/25/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/26/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/27/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/28/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/29/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/30/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
8/31/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89

Notes:

All measurements in pounds per square inch (psi)

Q3 2020 DAILY CASING ANNULUS PRESSURES - INJECTON WELLS

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FLORENCE COPPER INC.

FLORENCE, ARIZONA

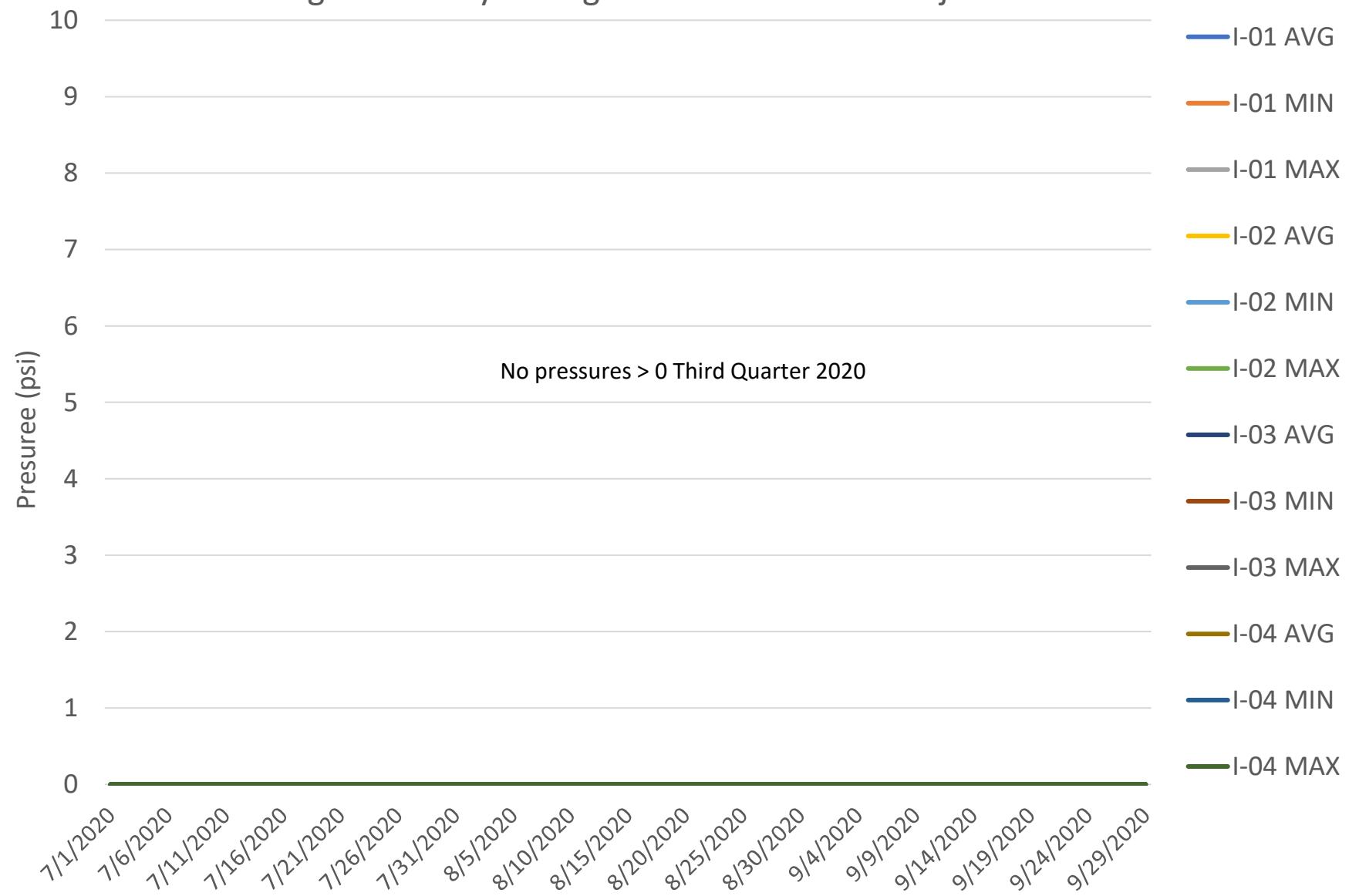
Table 6. September 2020 Daily Casing Annulus Pressures - Injection Wells

Date	I-01			I-02			I-03			I-04			Fracture Gradient
	Avg	Min	Max										
9/1/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/2/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/3/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/4/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/5/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/6/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/7/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/8/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/9/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/10/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/11/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/12/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/13/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/14/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/15/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/16/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/17/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/18/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/19/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/20/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/21/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/22/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/23/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/24/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/25/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/26/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/27/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/28/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/29/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89
9/30/2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.89

Notes:

All measurements in pounds per square inch (psi)

Figure 2. Daily Casing Annulus Pressures - Injection Wells



ATTACHMENT 11

Migratory Bird Landings

TABLE 1**Q3 2020 OBSERVED MIGRATORY BIRD LANDINGS**

FLORENCE COPPER INC.

FLORENCE, ARIZONA

Date	Time	Migratory Bird Species	Comments:	Fatality (Y or N)
9/8/2020	--	Duck, unknown	Landed for a short time before flying off	N

Notes:*Florence Copper personnel conduct daily inspections of the Process Solution Impoundment.*